
St. George's Park
National Football Centre

Proposed Enabling Residential
Development

The Football Association

Planning Statement

February 2010

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Nathaniel Lichfield and Partners

Planning Design Economics

**St. George's Park
National Football Centre**

Enabling Residential Development

Planning Statement

On behalf of the National Football
Centre Limited

23 February 2010

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Contents

1.0	Introduction and Context	1
2.0	The Application Site and Context	7
	The Application Site	7
	The NFC Site	8
	The Wider Site	8
	Land Surrounding the Wider Site	9
	Local Plan and Other Site Designations	9
	Planning History	10
3.0	Summary of the Residential Proposals	12
4.0	Policy Context and the Principle of Development	13
	The Emerging Development Plan	13
	Other Policy Considerations	14
	The Principle of Development	14
5.0	Enabling Development	16
	The Principle of Enabling Development	16
6.0	Contribution to Housing Requirements	25
	Housing Market	25
	Affordable Housing	25
7.0	Trees and Biodiversity	27
	The Loss and Retention of Trees	27
	Species and Habitats	27
8.0	Landscape and Visual Effects	29
	Visual Role	29
	Effects	29
	Mitigation	30
9.0	Sustainable Construction	31
10.0	Other Material Considerations	33
	Transport and Accessibility	34
11.0	Conclusions	37

Appendices

- Appendix 1 Framework for Biodiversity Action Plan
- Appendix 2 Summary of Planning History

1.0 Introduction and Context

- 1.1 The Football Association (The FA) purchased St George's Park (formerly known as Byrkley Park and referred to as 'the wider site'), Burton upon Trent, in 2001 and in the same year secured planning permission for the development of the National Football Centre (NFC). A number of pitches, access from the B5234, internal estate road and other structures have been constructed and the existing facilities are currently used by a number of football teams (including the junior England team and Burton Albion) for training. However, financial constraints meant that construction was suspended in 2004. The FA is now seeking to secure planning permission for revised proposals which better suit its operational, business and funding plans. The 2001 planning permission is a material consideration in the determination of the planning applications for the revised proposals.
- 1.2 The revised proposals are for new buildings in the centre of the site which will include an indoor football pitch, medical/exercise science facilities, offices for staff, a 228 bedroom hotel incorporating conference facilities and a health/fitness suite, together with changing facilities for community use towards the north of the wider site, a gatehouse close to the existing access and associated car parking. Residential development is also proposed as a means of delivering funding to enable the NFC to come forward.
- 1.3 This Planning Statement relates to the residential development. It has been prepared by Nathaniel Lichfield and Partners on behalf of The National Football Centre Limited ('the applicant') to accompany a planning application for 28 detached residential dwellings. The National Football Centre Limited is part of The FA. This Planning Statement, and other accompanying documents, make reference generally to 'The FA' as the governing body of football.
- 1.4 The application is submitted in outline with all detailed matters reserved for later approval, with six exceptions where The FA is seeking detailed approval at this stage:
- 1 means of access into the application site from the existing internal estate road which runs through the wider site;
 - 2 the alignment of the internal estate road through the application site as shown on the proposed layout plan (drawing reference: 09 003 901D);
 - 3 the maximum number of dwellings;
 - 4 the boundaries to built development for each plot and the distribution of open space as shown on the proposed layout plan (drawing reference: 09 003 901D);
 - 5 approximate site levels; and
 - 6 the principles of redevelopment that are proposed by the 'Detailed Design – Design Code' in the Design and Access Statement (DAS).

- 1.5 All other detailed matters including the layout, scale and appearance of the new houses as well as landscaping are reserved for later approval.

Accompanying Documents

- 1.6 The purpose of this Planning Statement is to explain how the residential application relates to relevant policies contained in the development plan. It deals also with site specific and technical issues that need to be dealt with through the determination process. In so doing, it draws from the conclusions of the following technical documents which accompany the application:

Design and Access Statement prepared by Redbox

- 1.7 The DAS explains that the layout for the residential development has been informed by a detailed assessment of the wider site and surrounding area. The DAS also explains the landscape strategy and confirms how relevant 'Building for Life' criteria can be met.

Transport Statement prepared by Aecom

- 1.8 Department For Transport guidance on '*Transport Assessment*' (March 2007), advises that Transport Statements (TS) should accompany applications that propose between 50 and 150 dwellings. Whilst a TS would not ordinarily be required, for completeness, The FA has agreed with Staffordshire County Council to prepare a TS to assess the potential impact of the residential development both in isolation and cumulatively with the NFC application.

- 1.9 Access to the wider site from the B5234 was improved following the grant of planning permission in 2001. As a result, the existing access into the wider site does not need to be altered as part of this application.

Sustainability Assessment prepared by Aecom

- 1.10 The Sustainability Assessment outlines how the design of the dwellings could achieve a high level of sustainability. It includes an assessment based on the West Midlands Sustainability Checklist.

Energy Statement prepared by Aecom

- 1.11 The Energy Statement outlines how the layout and design of the residential development could limit the impact of CO₂ emissions. It confirms that measures to improve energy efficiency through passive design have been incorporated and that green technologies will be used where possible.

Noise Assessment prepared by Aecom

- 1.12 The Noise Assessment considers noise levels across the application site and suggests mitigation measures where necessary to minimise potential impacts on the amenity of future residents.

Flood Risk Assessment prepared by Aecom

- 1.13 The Flood Risk Assessment investigates the various flood risk issues that could potentially affect the development of the application site, it has been prepared in accordance with the requirements of Planning Policy Statement 25 'Development and Flood Risk' (2006) and Environment Agency advice.

The Birds of Byrkley Park reports, prepared by Ian Wallace for The FA, relate to the wider site (April 2001 as updated in May 2001, January 2005, January 2006, March 2007, March 2008 and February 2009)

- 1.14 The wider site has been surveyed for birds by an experienced field ornithologist since 1995 albeit reports for The FA date from April 2001.

Invertebrate Survey prepared by Dr. Mark G. Telfer on behalf of Baker Shepherd Gillespie (January 2009)

- 1.15 The Survey relates primarily to the northern area of St. George's Park, including the application site and surrounding woodland.

Ecological Survey Report prepared by Baker Shepherd Gillespie (December 2008)

- 1.16 The Phase 1 Habitat survey relates to the wider site but notes that the application site comprises a number of trees, a small area of semi-improved grassland with a species poor hedgerow (which is dominated by hawthorn) along the north west boundary.

Great Crested Newt Survey Report prepared by Baker Shepherd Gillespie (January 2010)

- 1.17 The Report relates to the wider site and confirms that no Great Crested Newts (or any other amphibians) have been found in the pond to the east of the application site on the other side of Lin Brook (referred to as 'Pond 1'). Great Crested Newts have been identified on the NFC site and will be translocated to replacement ponds as part of that application under licence from Natural England.

Assessment of Fungal Interest prepared by Richard Tofts Ecology on behalf of Baker Shepherd Gillespie (November 2008)

- 1.18 The Assessment relates to the application site and notes that most of the fungi recorded during the survey is associated with trees, wood or other debris arising from trees. The grassland is unlikely to be of major mycological interest, in part, because it has been subject to agricultural improvement.

Arboricultural Survey and Development Report prepared by Dryad Tree Services

- 1.19 The Arboricultural Survey and Development Report provides information on the trees that need to be removed. It also incorporates measures for protecting trees during the construction phase and proposals for future management.

Statement of Community Involvement prepared by Nathaniel Lichfield and Partners

- 1.20 The Statement of Community Involvement sets out how The FA has complied with the requirements for pre-application consultation in ESBC's adopted Statement of Community Involvement. It demonstrates that the views of the local community have been sought and taken into account in the formulation of the development proposals where possible.

Geo-Environmental Desk Study, prepared by Arup

- 1.21 The Geo-Environmental Desk Study comprises a review of readily available geological, historical and environmental information for the site and included a site walkover survey. The Study provides preliminary ground-related considerations for the proposed development.

Report Structure

- 1.22 This Planning Statement comprises the following sections:

- 1 information on the application site, surrounding area and planning history (Section 2);
- 2 a summary of the residential proposals (Section 3);
- 3 the policy context and the principle of development (Section 4);
- 4 commentary on enabling development (Section 5)
- 5 contribution to housing requirements (Section 6);
- 6 the impact on trees and biodiversity (Section 7);
- 7 landscape and visual effects (Section 8)
- 8 sustainable construction (Section 9); and
- 9 other material considerations relating to ground conditions, transport/accessibility and flood risk (Section 10).

- 1.23 The Planning Statement concludes at Section 11 by summarising the key policy issues that are relevant to the determination of this application and notes that, with mitigation, there will be no material detrimental impact on ecology or trees. It also highlights the social, economic and sports benefits associated with enabling the delivery of the NFC.

Revised Proposals for the NFC

- 1.24 A separate full planning application for revised proposals for the NFC has been submitted by The FA at the same time as this application. The NFC application site ('the NFC site') is located to the south of the wider site.
- 1.25 The revised proposals for the NFC include:
- 1 new buildings in the centre of the site which comprise a full size indoor synthetic football pitch, a sports hall and associated facilities for sports fitness/science/medicine, changing rooms and ancillary office/training accommodation and a 228 bedroom hotel incorporating conference facilities and a health/fitness suite (referred to generally as 'the hotel and sports facilities');
 - 2 a building to accommodate 'community' changing facilities close to the three pitches that are located to the north of the wider site;
 - 3 a gatehouse to provide accommodation for security personnel close to the existing access to the wider site;
 - 4 car/coach/cycle parking spaces close to the hotel and sports facilities;
 - 5 access to the new buildings;
 - 6 a feature wetland area in front of the hotel;
 - 7 landscaping; and
 - 8 associated infrastructure works.
- 1.26 The FA is also proposing through the NFC application to make three pitches available for use by the community at weekends and at certain times during the week as is necessary. The pitches will be maintained by The FA and managed by East Staffordshire Borough Council (ESBC).
- 1.27 The 2001 planning permission required the implementation of a twenty year Landscape and Ecology Plan (LEMP). This was agreed and is operational. The FA considers that greater benefits for biodiversity can be achieved and is therefore, proposing to prepare a Biodiversity Action Plan (BAP) to replace the LEMP. The BAP will outline measures for ecological enhancement and management across the wider site.
- 1.28 A framework for the BAP is attached at Appendix 1 for information. The FA expects that provisions relating to completion/implementation will need to be secured through a S106 Agreement. The obligations would be linked to the revised proposals for the NFC.
- 1.29 The 'dirty seminar rooms' and other buildings that were constructed following the grant of planning permission in 2001 are not affected by this application. The existing pitches (with the exception of the pitch that will be redeveloped for the new indoor pitch) will be retained. An outdoor pitch located adjacent to the proposed indoor pitch will be re-orientated by 90°. The internal estate road will not be altered except in the area up to and around the hotel and sports facilities and to accommodate the gatehouse.

- 1.30 It is anticipated that the two applications will be determined at the same time. If the Local Planning Authority resolves to grant planning permission for both proposals, a S106 Agreement will be required to ensure that no housing is developed before a certain stage in the development of the revised proposals for the NFC.
- 1.31 The two applications are inextricably linked. A number of issues (such as on biodiversity and the social/economic/sports benefits associated with the delivery of the NFC) relate to the wider site and/or the delivery of the NFC but are of relevance to the determination of this application. Moreover, the Environmental Statement (ES) that accompanies the NFC application assesses the cumulative impact of the residential development with the NFC. This Planning Statement therefore, makes reference where appropriate to proposals contained within the NFC application and some accompanying reports relate to the wider site.

2.0

The Application Site and Context

The Application Site

2.1

The application site extends to approximately 6.07 hectares and is located about 7 kilometres to the west of Burton upon Trent (Figure 2.1 below). It is outside the 'development boundary' (as defined on the Proposals Map to the adopted East Staffordshire Local Plan) and within an area of countryside. For the purpose of the application of planning policy, the site would be regarded as 'greenfield'.

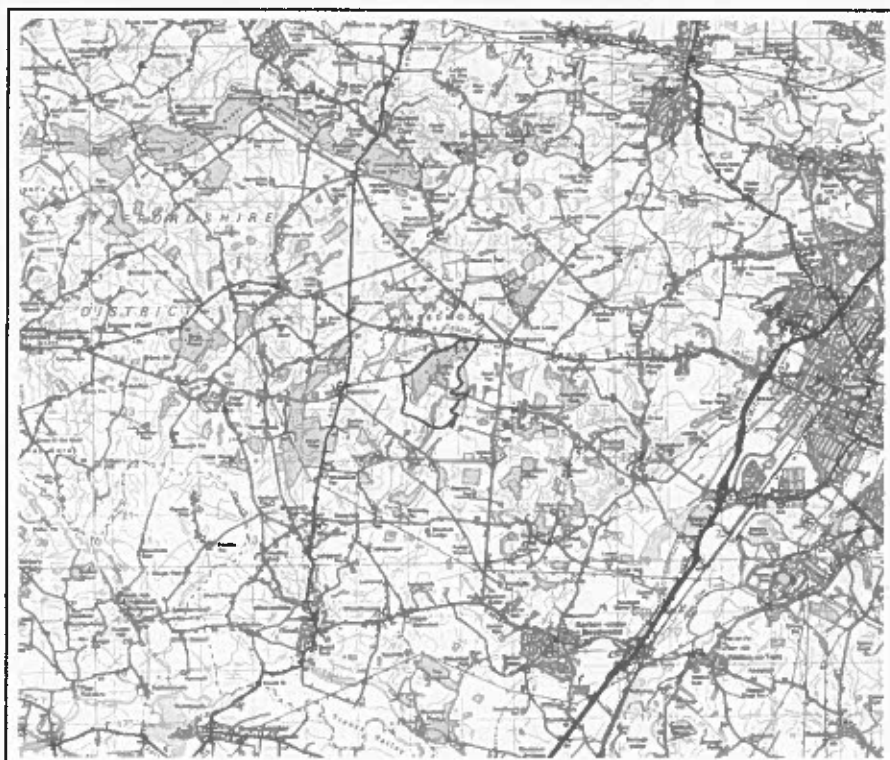


Figure 2.1 Site Location Plan

2.2

The topography of the NFC site falls gently from north to south. There are a number of trees within the application site which vary in terms of age and amenity value and trees within and adjacent to the application boundary are classified as 'veteran'. None are protected by a Tree Preservation Order (TPO).

2.3

Access to the wider site is currently from the B5234 via the existing internal estate road. There is no formal access into the application site.

2.4

A mixed species hedge (with a predominance of hawthorn) runs along the north west boundary. Other boundaries to the application site are not defined by fixed features.

The NFC Site

- 2.5 The NFC site is located to the south of the wider site and extends to approximately 22.4 hectares. It comprises:-
- 1 footings that were constructed following the grant of planning permission in 2001 (which have now filled with water and are populated by Great Crested Newts);
 - 2 a full size synthetic pitch (with floodlighting) which was also developed following the grant of planning permission in 2001;
 - 3 grassland with areas of tree planting;
 - 4 parking areas with space for approximately 250 cars and six buses/coaches; and
 - 5 the internal estate road.
- 2.6 Access to the NFC site is currently from the B5234 via the internal estate road.
- 2.7 Byrkley Hall, which was erected in the 1890s, once occupied part of the area that is now footings, but was demolished in 1952. A stable block and outbuildings were largely demolished in 1991. A small number of features are still present (including the remains of the estate's original icehouse).
- 2.8 The topography of the NFC site falls gently from the north to the south by approximately 4m (maximum height is approximately 118m AOD). There are a number of trees within the application site which vary in terms of age, quality and amenity value. None are protected by a TPO.

The Wider Site

- 2.9 The application site lies within the wider site, which is also owned by The FA and extends to approximately 143 hectares (352 acres).
- 2.10 The aerial photograph at Figure 2.2 shows that the wider site comprises a number of pitches and various buildings constructed pursuant to the 2001 permission as well as areas of grazed parkland, arable farmland, woodland and wetland.
- 2.11 The Lin Brook runs along a north-south axis through the centre of the wider site. A system of weirs has been used to create a series of open pools along the course of the brook, which is otherwise a relatively shallow and narrow wetland corridor.
- 2.12 As well as the main vehicular access off the B5234, there is a secondary access to the east via the Byrkley Park Garden Centre. Public footpaths follow the north-west and western boundary and also cut across the extreme south east corner of the wider site.
- 2.13 The topography within the wider site falls gently along the length of the Lin Brook. The ground on either side of the Brook rises gently, incorporating a series of minor undulations, towards the eastern and western boundaries, to a

maximum height of 125 metres AOD. The existing football pitches form a series of unobtrusive plateaux within this landscape.

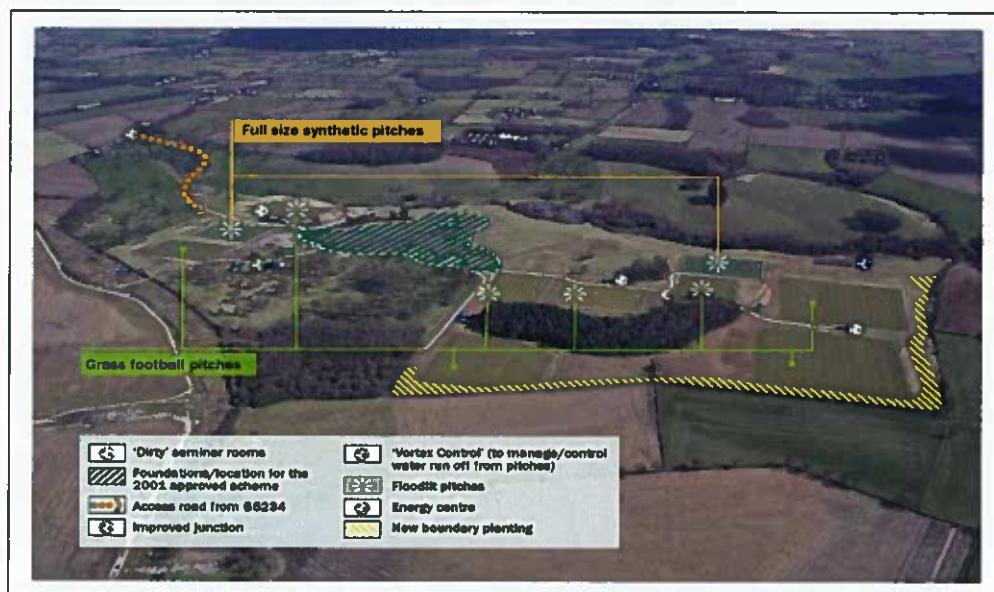


Figure 2.2 Aerial Photograph of the Site

Land Surrounding the Wider Site

- 2.14 The wider site lies within an area of countryside that is characterised by a gently rolling topography interspersed with woodland blocks, hedgerows and influenced by arable and pastoral agricultural practices. Views into the wider site from publicly accessible locations are very limited.
- 2.15 Tatenhill Airfield (a private airfield) is located immediately to the north-west. Land around the rest of the wider site is largely open countryside with a limited number of residential properties in close proximity. Byrkley Park Garden Centre is located to the east.
- 2.16 The nearest railway station is at Burton upon Trent which is located on the mainline between Birmingham New Street and Derby/ Nottingham. There are no bus stops in the immediate vicinity.

Local Plan and Other Site Designations

- 2.17 The application site is not allocated on the Proposals Map to the adopted East Staffordshire Local Plan (LP) for a specific use (see extract at Figure 2.3). It is however, affected by the National Forest, which is a blanket designation covering 200 square miles and including existing settlements.
- 2.18 Land immediately to the south is within the Byrkley Park Site of Biological Importance (SBI). The application site does not encroach into this designated area.

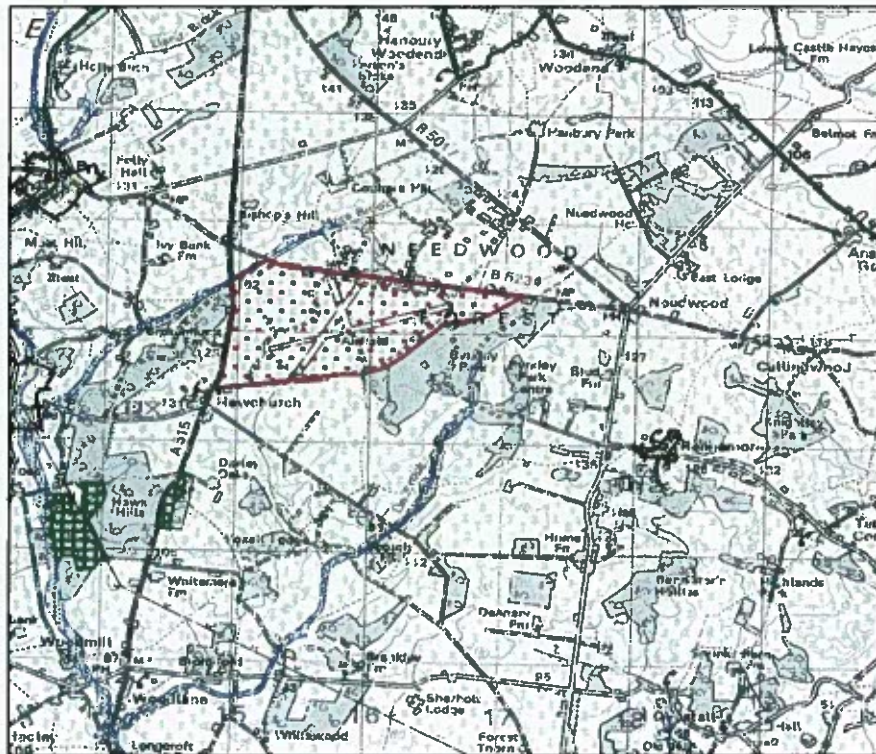


Figure 2.3 East Staffordshire Borough Council Local Plan Proposals Map Extract

Planning History

- 2.19 Various planning permissions have been granted for the development of the wider site for sports/hotel uses which are listed in the schedule at Appendix 2. The 2 applications referred to below are of most relevance to the determination of this application and the revised proposals for the NFC.

2001 Outline Planning Permission

- 2.20 The FA secured outline planning permission (Ref: PA/16573/010/P0) in 2001 for the development of a NFC. The approved scheme makes provision for:

- 1 4 full size grass football pitches (3 of which are floodlit);
- 2 2 full size synthetic football pitches (both floodlit);
- 3 3 'flexi-pitch' training areas and 2 goalkeeper training areas;
- 4 the 'training house', which comprises a full size indoor synthetic pitch, wet and dry fitness facilities and an area for sports medicine;
- 5 the 'living house', which comprises 'short term residential accommodation' (150 rooms maximum capacity for 300 bed spaces) with a cafeteria, lounges and games rooms;
- 6 the 'learning house', which contains teaching and seminar facilities, media facilities and office accommodation;

- 7 3 dwellings of two storey to provide accommodation for 3 permanent residential staff;
- 8 a kit research building;
- 9 5 'dirty seminar rooms' to provide accommodation for half-time discussion;
- 10 3 parking areas containing a total of six bus spaces and 250 car parking spaces;
- 11 a new entrance with access on to the B5234; and
- 12 a range of other buildings including an energy generation building, fuel store, water storage treatment and a sewage treatment works.

2.21 A S106 Agreement (14 September 2001) forms part of that permission. It requires:

- 1 payment of a highways improvement contribution;
- 2 entering into a legal agreement to procure the carrying out of the site access works;
- 3 the preparation, agreement and implementation of a signage strategy;
- 4 reasonable endeavours to be made so that construction traffic enters or leaves the application site via the B5234;
- 5 implementation of the LEMP in accordance with its programme of implementation; and
- 6 submission and approval of a Green Travel Plan.

2.22 The highways contribution has been paid, the site access works have been implemented and a 20 year LEMP has been agreed and is operational. Other requirements were not progressed because development was suspended.

1991 Outline Planning Permission

2.23 Outline planning permission (Ref: OU/1657/003) was granted in 1991 for a hotel/conference/leisure/golf complex and 29 detached residential dwellings. An indicative layout plan was submitted with the application, which shows housing located to the north-west of the site (in the same approximate location as the application site).

2.24 The 1991 permission is also a material consideration although the weight attached to it is tempered by the fact that the approval is time expired and has never been implemented.

3.0 **Summary of the Residential Proposals**

3.1 The proposed residential development is explained in detail in the DAS (and the Detailed Design - Design Codes at Section 5 of the DAS fix certain design principles). It shows that key elements of the proposal are as follows:

- 1 a high quality low density development of 28 detached open market dwellings which will be between 4 and 6 bedrooms and of a contemporary design;
- 2 dwellings will generally be 2 storey (incorporating 1 storey and 2.5 storey elements to add interest/variety where appropriate) with 3 storey dwellings only being acceptable where there is a need to create a focal point and where the height would not be more than 11.5 metres above ground to ridge;
- 3 building footprints will not exceed 25% of the plot area and dwellings will be appropriately set-back from the road and adjoining properties to prevent over-development;
- 4 all dwellings will meet 'Lifetime Homes' criteria and achieve at least Code Level 3 for Sustainable Homes;
- 5 dwellings will be set back from the north-west boundary by approximately 15 metres to maintain a green corridor and reduce visual impact from the surrounding countryside;
- 6 access will be from the existing internal estate road which runs through the wider site;
- 7 the internal estate road through the application site will wind around retained trees and vary in width throughout;
- 8 there will be no street-lighting to minimise visual impact at night time;
- 9 any veteran trees will be retained within fenced landscaped areas for root protection and to ensure that areas beneath canopies are not disturbed;
- 10 finished levels will relate closely to existing site levels reflecting the fact that the ground around retained trees will not be disturbed;
- 11 woodland planting will enhance biodiversity and habitat creation;
- 12 a new pond will be created close to the proposed access and grass swales will be incorporated alongside the proposed internal estate road and to the south of the existing internal estate road as part of the sustainable drainage system; and
- 13 a wastewater treatment facility (which will be underground) will be incorporated to the north of the access into the application site.

3.2 The DAS explains the overall form that the residential development will take. It describes a carefully conceived layout which minimises the impact of development on interests of acknowledged importance including trees, ecology and the landscape.

4.0 **Policy Context and the Principle of Development**

4.1 When determining applications for planning permission, Part 3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires Local Planning Authorities to begin by having regard to the 'development plan'. If the Authority concludes that the development plan contains provisions that are of relevance, it must determine the application in accordance with the development plan unless material considerations indicate otherwise.

4.2 The development plan in East Staffordshire comprises:

- 1 the Regional Spatial Strategy (RSS) for the West Midlands, which was issued in January 2008;
- 2 the saved policies of the Staffordshire and Stoke-on-Trent Structure Plan (SP) 1996 – 2011, which was approved in February 2002
- 3 the saved policies of the East Staffordshire Local Plan (LP), which was adopted in July 2006.

The Emerging Development Plan

4.3 The RSS was first issued as Regional Planning Guidance (RPG) in June 2004. At that time a number of issues were identified for further work. These issues were subsequently divided into 3 tranches of work with each one forming a partial revision to the RSS:

- Phase 1 – the Black Country Study
- Phase 2 – covering housing figures, centres, employment land, transport and waste
- Phase 3 – covering critical rural services, culture/recreational provision, various regionally significant environmental issues and the provision of a framework for Gypsy and Traveller sites.

4.4 The RSS which was issued in 2008 incorporates the outcomes of the Phase 1 revision.

4.5 The Phase 2 revision is at an advanced stage and some of the policies contained within it (such as on sustainable development) are now being applied by ESBC. The Examination in Public (EiP) into the Preferred Option was held between April and June 2009. The EiP Panel submitted its report to the Secretary of State in September 2009 and publication of Proposed Changes is imminent.

4.6 An Options document for the Phase 3 Revision was published for consultation in June 2009. However, in September 2009 Officers from the Regional Assembly agreed that the Phase 3 revision should be progressed through the new Regional Strategy process rather than through the RSS. All Phase 3 work

undertaken to date has, therefore, been 'banked' and will form part of the preparation process for the new Regional Strategy.

- 4.7 ESBC's LDF has not yet progressed to a stage for it to be material to the determination of this application.

Other Policy Considerations

- 4.8 In terms of other policy considerations, ESBC has a number of adopted Supplementary Planning Documents (SPDs) and Supplementary Planning Guidance notes (SPGs) which also need to be considered through the determination of this application. Notably, the SPD on Design Guidance was approved in February 2008 and has been taken into account in preparing the 'Detailed Design – Design Codes' in the DAS. National Planning Policy Statements/Guidance (PPSs/PPGs) will also be material considerations in the determination of this application.

The Principle of Development

- 4.9 In determining any application, the planning history of a site is an important material consideration. In this instance, the Local Planning Authority concluded that the wider site would be suitable for the development of the NFC when it granted planning permission in 2001. The 2001 planning permission has been implemented and could be completed at any time. In the absence of any material changes in policy since the grant of planning permission in 2001, we conclude that the principle of developing the wider site for the NFC has already been established.
- 4.10 The 2001 planning permission did not envisage the need for enabling development to deliver the NFC and did not incorporate any housing to the north west of the wider site (albeit the expired 1991 permission did). Since that time, The FA's operational, funding and business plans have changed.
- 4.11 At a general level, the development of housing on a 'greenfield' site, which is neither within, or adjacent to, a defined development boundary would not be in accordance with established planning policy. Enabling development is contrary to established planning policy but is permitted because it enables the delivery of benefits that clearly outweigh any harm that might be caused, and which would not otherwise be achieved if the development did not come forward. This application, therefore, needs to consider whether the residential development is enabling development and, if so, the impact of the proposal.

4.12

Section 5 considers various tests and concludes that the residential development is enabling development. On this basis, and having undertaken a thorough review of the development plan and other policy considerations, we conclude that the following key issues need to be considered in determining this planning application:

- 1 contribution to housing requirements;
- 2 the impact on trees and biodiversity;
- 3 landscape and visual effects;
- 4 sustainable construction; and
- 5 other material considerations relating to noise, transport/accessibility and flood risk.

4.13

These key issues influence layout and detailed design and are considered in Sections 6 to 10 of this Planning Statement. More detailed assessments can be found within the other documents that accompany this application. Relevant policy analysis is also included within each of these other documents. The key issues are only relevant for consideration once the enabling case has been established.

5.0 Enabling Development

The Principle of Enabling Development

5.1 The principle of enabling development is well established in planning decisions but there is no set guidance at the national or local level. However, the English Heritage (EH) document '*Enabling Development and the Conservation of Significant Places*' (2008) has defined the term as:

"Development that would be unacceptable in planning terms but for the fact that it would bring public benefits sufficient to justify it being carried out, and which would not otherwise be achieved"

5.2 'The Policy' at page 5 of the EH document states that enabling development would be unacceptable unless it meets seven criteria (a - g). Criteria a - d relate specifically to the heritage value of buildings and so are not relevant to this application. Criteria e to g are as follows:

- e sufficient subsidy is not available from any other source;
- f it is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the place, and that its form minimises harm to other public interests; and
- g the public benefit of securing the future of the significant place through such enabling development decisively outweighs the disbenefits of breaching other public policies.

5.3 We have interpreted these criteria and defined more relevant tests against which the enabling development proposed by this application can be assessed. These are as follows:

- 1 whether there is an identified 'need' for the NFC at St George's Park;
- 2 whether 'need' could be met without funding from enabling development;
- 3 whether housing is the most appropriate form of enabling development;
- 4 that the enabling development is the minimum necessary to secure the delivery of NFC at St. George's Park; and
- 5 whether the benefits that will be secured by the delivery of St. George's Park through enabling development outweigh any disbenefits.

5.4 We outline below how the residential application meets these tests and conclude that it is 'enabling'.

1. Whether there is an identified 'need' for the NFC at St George's Park

5.5 The FA has the responsibility of overseeing football in England. It was founded in 1863 and is a not-for-profit organisation that invests £60 million a year back into the game. This investment comes from the income generated by The FA's broadcast and sponsorship partnerships.

- 5.6 Football is the biggest team sport in England. Every month nearly 7 million people play some form of the game including 3.9 million children. The scope and reach of football across various levels is considerable. For example:
- 1 The FA runs 24 England teams including women's, youth and disability sides as well as the England senior team;
 - 2 women's football is the fastest growing sport in the country and over 1 million women and girls participate in the sport;
 - 3 there are 125,000 FA-affiliated teams playing in over 1,700 leagues;
 - 4 there are over 25,000 qualified referees in England;
 - 5 over 500,000 volunteers work in football;
 - 6 The FA is currently committed to investing £200 million into grassroots football through its National Game Strategy;
 - 7 Almost 90,000 coaches have gained their Level 1 qualification over the last 3 years;
 - 8 Over 1 million children aged 5 - 11 have received coaching via The FA Tesco Skills Programme since 2007; and
 - 9 The FA has helped the Football Foundation become the largest sports charity in the country with an annual investment of £15 million.
- 5.7 Unlike most major football nations, England does not have its own bespoke training and education centre. The most famous facilities in other countries are Clairefontaine in France (based in Paris), Coveciano in Italy (near Florence) and Ciudad Del Futbol in Spain. St George's Park will provide England with a centre of excellence for football training and development. It will create a critical mass of expertise and experience in a central and accessible location and have a profile as the home of football development in England.
- 5.8 The objectives for St George's Park include:
- 1 developing an inspirational centre for coach education;
 - 2 creating a route to a career path in football coaching;
 - 3 delivering courses, in association with higher and further education providers, for all football related careers;
 - 4 establishing a leading centre for research and development for sports science and sports medicine; and
 - 5 ensuring an inspirational training home for Club England (i.e. all England men's and women's teams across all age groups).
- 5.9 In this context, the 'need' for St George's Park is based on the principle that:
- 1 a strong professional game is fundamental to creating interest in football at the grassroots level; and
 - 2 one of The FA's core objectives is to see England teams winning.
- 5.10 The development of St George's Park will assist in developing world class players and coaches and provide a focus for community participation in football which will, in turn, play an integral part in achieving these objectives.

5.11 The FA's objectives for St George's Park sit alongside the Government's objective to encourage wider participation in sport thus helping to create a more active nation and improve performance. In June 2008 the DCMS published '*Playing to win – a new era for sport*', which sets out the Government's ambition to become a truly world leading sporting nation, capitalising on the 2012 Olympic Games and Paralympic Games. As part of that ambition, DCMS recognise that the promotion of sport at a grassroots level is vital. It also supports UK Sport in helping the UK towards world class success.

2. Whether 'need' could be met without funding from enabling development

5.12 The FA has submitted financial information to the Local Planning Authority which demonstrates that the development of St George's Park will be funded principally by The FA, Umbro, 'the football family', sponsorship, development of the hotel and public sector grant. However, even with these revenue streams, there is a gap in funding which can not be met.

3. Whether housing is the most appropriate form of enabling development

5.13 Housing is the most appropriate form of development in this location because it is capable of generating higher land values (compared to other uses such as employment) and can be delivered without any material harm to other interests of acknowledged importance (such as trees and ecology).

4. That the enabling development is the minimum necessary to secure the delivery of St George's Park

5.14 Based on current valuations and in the current economic climate, the development of 28 detached houses for sale on the open market will fill about 50% of the funding gap. It is therefore, less than the 'minimum' that is required to secure the delivery of St George's Park. Funding that has already been secured from other sources will enable the development of the revised proposal for the NFC to commence. The expectation is that additional funding to fill the remaining gap will be secured in the event that planning permission is granted. This is because planning permission can help demonstrate deliverability and so provide developers/lenders/sponsors/investors with some certainty.

5. The benefits that will be secured by the delivery of St George's Park through enabling development will outweigh any disbenefits

5.15 The social, economic and sports benefits that will be secured by the delivery of St George's Park through enabling development are significant. There are 4 key indicators and each is considered below.

(i) Social and Economic Benefits

5.16 One of the key objectives of Planning Policy Statement 4 (PPS4): '*Planning for Sustainable Economic Growth*' (2009), the RSS '*Regional Vision*' and the '*East Staffordshire Economic Regeneration Strategy*' (2007 - 2012) is to achieve improved economic performance whilst having regard to relevant social and environmental considerations. Sections 7-10 of this Planning Statement, and other documents that accompany both this application and the NFC application (such as the ES, DAS and ecological surveys), explain that environmental considerations have been fully considered. The Economic Impact Assessment and ES (socio-economic chapter) which accompany the NFC application explain that the revised proposals for the NFC will have wide-ranging economic and social benefits at a local, regional and national level.

5.17 In summary, the revised proposals for the NFC will:

- 1 result in a capital investment of approximately £55 million (including spending on building materials and labour/professional fees associated with design development/construction);
- 2 create annual expenditure of approximately £9 million (including spending on wages and the supply of goods/services) with approximately 60% (or £5.5 million) of the total spend likely to be in the West Midlands;
- 3 generate up to 50 full time equivalent jobs during the construction period; and
- 4 create up to 221 net additional full time equivalent jobs at the sports and hotel facilities once operational with up to 55 'spin-off' jobs in services and firms in the local area with the potential for up to 90 'spin off' jobs in the Region; and
- 5 generate £5.5 million supplier and wage expenditure in the local area per annum with an additional £2 million 'spin-off' expenditure in the West Midlands

5.18 In addition to these, a number of less measurable benefits will arise from the revised proposals for the NFC. These include:

- 1 enhancement of the profile of the area with a boost to investment confidence and potential;
- 2 long term expenditure by residents, employees and visitors;
- 3 contributing to the vitality and viability of the tourism sector by attracting visitors to the area with the potential for linked-trips to other attractions as well as shops/services in Burton upon Trent and other settlements;
- 4 creation of additional business visits to the area;
- 5 the development of flagship sports facilities acting as a potential catalyst for further sports investment; and
- 6 the expansion of football pitches in the local community with the potential for additional football tournaments to be attracted to the area.

- 5.19 RSS Policy PA10 (Tourism and Culture) encourages the further development of tourism and culture, including sport and hotels, as a key element in the diversification of the Regional economy. In so doing, recognition is given to the important contribution that tourism and culture can make to employment generation, local business development, environmental quality, educational opportunities and regeneration.
- 5.20 LP Policies E19 and 20 (Tourism) similarly support tourism in appropriate locations and as a means of promoting both rural diversification and urban regeneration. The supporting text acknowledges that the National Forest has led to the establishment of a significant tourist resource and encourages distinctive new attractions in rural locations subject to them being compatible with policies directed towards protecting the countryside and areas of important landscape.
- 5.21 The impact of the revised proposals for the NFC on the environment (including biodiversity) and the character of the countryside are addressed by the ES which accompanies the NFC application. It demonstrates that with appropriate mitigation and management, the revised proposals for the NFC can be implemented without any overriding harm to either ecological interests or landscape character. Moreover, the headline factors set out above show that the economic and social benefits arising from the revised proposals for the NFC will be substantial.

(ii) Sports Benefits

- 5.22 The Regional Plan for Sport in the West Midlands (2004 - 2008) aims to increase general participation in sport in the Region as well as improve the performance of athletes in international competition. Action IPE12 considers that the attraction of more national and international sporting events in the Region will assist in boosting mass participation and elite performance. The delivery of significant benefits for sports through the provision of football training and education programmes for players, coaches and referees across all levels and the provision of community pitches will assist in meeting these objectives. For example:
- 1 The FA anticipates that St George's Park will play a significant role in helping to develop a winning mentality at a national level and for sharing best practice in football training, coaching and development;
 - 2 St George's Park will be used for training all of the England teams during the year, including:
 - i the Senior Men's Squad;
 - ii the Senior Women's Squad;
 - iii the Men's Youth Teams (under 16s, 17s, 18s, 19s, 20s, and 21s);
 - iv the Women's Youth Teams (under 15s, 17s, 19s and 21s); and
 - v Disabled Teams (blind, partially sighted, deaf and hearing impaired, amputees, cerebral palsy and learning difficulties).

- 3 St George's Park will become the sporting destination of choice for coaches, players, administrators and officials and The League Managers Association have committed to making St George's Park their future headquarters;
- 4 St George's Park will host The FA's elite training courses, accommodating some of the accredited modules run by The FA to complement those operated by County FA branches;
- 5 it is anticipated that St George's Park will act as a base for potential International FIFA and UEFA tournaments, hosted by England, such as the UEFA Men's Under-21 European Finals and the FIFA Women's World Cup with fixtures to be played at stadia around the West Midlands;
- 6 St George's Park will provide a potential events and training facility for the London 2012 Olympic Games and will potentially form part of the overall package of facilities available in the Midlands to attract pre-Games acclimatisation and holding camps;
- 7 Burton Albion Football Club will continue to use St George's Park as a training ground; and
- 8 The FA is proposing to ensure that three pitches are made available for community use which could help address identified deficiencies in East Staffordshire of mini/junior pitches.

5.23

As well as the more direct impacts associated with promoting sporting success, investment in sport is increasingly linked to wider agendas on health and wellbeing, creating safer and more inclusive communities and supporting local economic prosperity. In this context, the revised proposals for the NFC will also meet the following general objectives identified in ESBC's '*PPG17 Open Space Playing Pitch Study*' (Draft Strategy, June 2009):

- 1 contribute towards ensuring an appropriate distribution and provision of good quality playing pitches and associated facilities;
- 2 assist in improving the quality and capacity of existing pitch provision to meet the needs and aspirations of sports governing bodies, affiliated leagues, local sports clubs and ESBC;
- 3 increase demand for, and participation in, outdoor sports; and
- 4 assist in improving the health and wellbeing of residents by providing sport and physical activity opportunities at high quality outdoor facilities.

5.24

As a high profile development, which will make significant additional contributions to pitch provision for all levels of participation, it is expected that St George's Park will have a very positive impact on sport and the wider place-shaping agenda.

(iii) Long term Ecological and Landscape Enhancement

5.25

The NFC application explains that the development of the hotel and sports facilities will have some impact on biodiversity. However, the implementation of appropriate mitigation measures and management will ensure that any adverse effects are minimised. Moreover, a range of proposals are being worked up for

inclusion in the BAP which will preserve and significantly enhance biodiversity interests across the wider site. Examples across the wider site include:-

- 1 woodland/parkland creation to the east of Lin Brook;
- 2 the appropriate management of grassland including the restoration of an extensive area of unimproved neutral grassland to a more species-rich state;
- 3 the planting of native trees at certain locations along the Lin Brook;
- 4 the restoration of ponds along Lin Brook;
- 5 pond creation (as part of a Great Crested Newt relocation strategy);
- 6 changes to agricultural cultivation regimes to enhance the ecological value of arable habitat to the east of Lin Brook;
- 7 the introduction of a programme of natural regeneration over a 20 year period to ensure the continuity of veteran and mature trees;
- 8 the provision of bat, bird nest and barn owl nest boxes;
- 9 less intensive management of grassland along the southern boundary of the wider site to enhance habitat for the brown hare; and
- 10 the Great Crested Newt relocation ponds and the wetland feature to the north of the hotel will be developed to maximise habitat value for invertebrates (such as dragonflies, damselflies, wasps and solitary bees).

5.26 This approach is entirely in accordance with policy contained in the development plan.

(iv) Contributions to National Forest Objectives

5.27 RSS Policy QE8 (Forestry and Woodlands) and LP Policy CSP6 (National Forest) support the preservation and creation of woodland as part of the National Forest initiative and as a means of contributing to wider objectives relating to health, recreation, rural diversification and regeneration.

5.28 The '*National Forest Strategy*' (NFS) (2004) promotes the creation of the National Forest which, in general terms, seeks to protect and improve the environment through the creation and management of new woodland and wildlife habitats alongside the creation of new opportunities for recreation, sport and tourism development and the regeneration of the local economy. The principles of the NFS are embodied in LP Policies BE2 (National Forest: Built Development) and NE14 (National Forest: Planting Schemes).

5.29 Table 16 of the NFS outlines a range of objectives linked to the benefits of development-related planting and landscaping. Developments which meet these objectives, and help to achieve wider benefits, are considered by the National Forest Company to be in accordance with the Forest Strategy. We have assessed the revised proposals for the NFC against each of these objectives.

Objective	Proposal
Creating an Attractive Wooded Setting	New woodland planting and management (including woodland/parkland creation to the east of Lin Brook) coupled with sensitive design and an appropriate use of materials will assist in creating a high quality scheme and ensure that the proposals for St George's Park are integrated into the Forest setting.
Creating and Managing Wildlife Habitats	The BAP will provide a strategy for the management and enhancement of various habitats across the wider site. The BAP, together with the mitigation that is proposed in the Biodiversity chapter of the ES that accompanies the NFC application will ensure that biodiversity targets are met.
Creating Recreation Opportunities	<p>St George's Park will provide significant sports and recreational opportunities for those involved in FA training and learning programmes. It will also feature pitches and changing facilities for use by the local community which will enhance what is currently available to local people.</p> <p>St George's Park will help support tourism through the provision of a high quality hotel which meets an identified need in this location and by helping to raise the profile of the National Forest as a visitor destination.</p>
Meeting Strategic Policy Objectives	The wider site is defined by the National Forest 'Landscape Character Areas and Landscape Types' map as 'Woodland Parklands', which are mainly well wooded landscape, ancient woodland priority areas and some woodland linkage areas. The landscape strategy in the DASs for the NFC and residential applications confirms that planting scale, type and design will accord with the Forestry Design Guidance, and that veteran trees will be retained and managed.
Involving Local Communities	For operational and security reasons, the wider site will not be accessible to people who are not staying at the hotel or attending football training sessions/ learning programmes. Also, land to the east of Lin Brook is currently being farmed under licence by a third party, which restricts opportunities for general public access. However, three pitches are being made available for community use and will provide a significant sports asset for local people. Also, the BAP is being worked up in consultation with various individuals and organisation and there may be opportunities in the long term to involve the local community in environmental schemes through organisations such as the Staffordshire Wildlife Trust.

5.30

By meeting these objectives, a range of other social, economic and environmental objectives can also be met including, for example, improving the local economy through a range of measures such as jobs in landscaping work,

the creation of a more attractive environment which helps to attract new investment and creating a healthy environment because trees filter polluted air and help to absorb carbon dioxide in the atmosphere.

5.31

This Section has concluded that the residential development is enabling and outlined the significant benefits that are capable of being delivered through the realisation of revised proposals for the NFC. At a strategic level, the significant benefits clearly outweigh any disbenefits that might be associated with policies relating to the preferred location for new housing development.

6.0

Contribution to Housing Requirements

Housing Market

6.1

ESBC's 'Housing Strategy' (2009 – 2014) sets out a high level strategy so that the Council can assess and plan for current and future housing needs in the Borough across all tenures. By way of background to the housing market, the Strategy notes that:

- 1 in summer 2008, local estate agents noted demand for about 200 executive homes (and The FA has obtained more recent advice from local estate agents which suggests that, even in the current economic climate, there is continued demand for executive homes);
- 2 the population of East Staffordshire is projected to grow by 8,000 by 2016 and by 21,000 by 2031 (a 20% increase);
- 3 the Council aims to attract higher added value employment to Burton and this will require good quality housing for workers, especially senior/managerial staff.

6.2

The Council's 'Strategic Response' to these issues (as well as other issues) is set out in the 'Strategy' and will, in due course, be incorporated into the relevant Local Development Documents. Of note, reference is made to the need for 'family housing' and an appropriate number of high end/executive homes (albeit the principal focus for development is Burton). This application can contribute to meeting this objective because it will deliver houses of this type.

Affordable Housing

6.3

It is widely accepted that affordable housing is provided as an element of larger housing developments in line with the Government's commitment to providing homes for everyone. LP Policy H12 states that an element of affordable housing should be provided on sites with capacity for 25 or more dwellings. Planning Policy Statement 3 (PPS3) on 'Housing' (2006) recognises that when Local Planning Authorities decide targets for individual sites, they must consider issues of economic viability and must take into account risks to delivery and levels of finance available for affordable housing (Paragraph 29). PPS3 therefore, clearly recognises that economic viability is an important material consideration in the provision of affordable housing.

6.4

This application does not include any affordable housing for economic viability reasons and this is justified through the financial information submitted to the Local Planning Authority, which will be independently assessed by the District Valuation Office. The provision of housing is enabling development for the delivery of St. George's Park and there is no scope to provide any affordable housing. Whilst this conflicts with LP requirements, there are justifiable and demonstrable reasons which are specific to this project. The wider benefits of St. George's Park to East Staffordshire and to the Region as a whole have been

considered and outweigh any disbenefits that might be associated with not complying with LP Policy H12 in this case.

7.0

Trees and Biodiversity

7.1

Preceding sections of this Planning Statement have confirmed that the residential development is enabling. Section 6 has also confirmed that the development of large detached dwellings could contribute towards meeting a demonstrable requirement for high end/executive homes. Even having established these points of principle, it is necessary to determine how more detailed design might impact on interests of acknowledged importance. This Section therefore reviews the potential impact of the residential development on trees, biodiversity and Section 8 assesses views and landscape character. Sustainable construction is discussed in Section 9 and details of how the scheme will address noise, transport/accessibility and flood risk is explained in Section 10.

The Loss and Retention of Trees

7.2

SP Policy NC13 (Protection of Trees, Hedgerows and Woodlands) and LP Policy NE12 (Trees) seek to ensure the retention of trees wherever possible but accepts that trees may necessarily be lost as a result of development. Where trees are lost, the adopted LP proposes that replacement tree planting will be required as a means of mitigation.

7.3

The remaining trees within the application site, and all retained trees across the wider site (including all veteran trees), will be appropriately protected during the construction period. In the longer term, they will be managed through the BAP.

7.4

The layout and design is based on the principle that most trees, and any veteran trees, are retained with replacement planting proposed to mitigate the removal of 8 trees within or adjacent to the application site which are in a poor and declining condition (and as such have very limited life expectancy). This is entirely in accordance with the aims of policy in the development plan.

Species and Habitats

7.5

RSS Policy QE7 (Protecting, managing and enhancing the Region's Biodiversity and Nature Conservation Resources) seeks to encourage the maintenance and enhancement of the Region's biodiversity resources. It recognises that the quality of biodiversity on most sites depends on good management. The BAP demonstrates that the development process is a sound way of achieving the favourable management of assets that are worthy of protection and improvement.

7.6

Comprehensive surveys have been undertaken to establish the presence of 'protected' species (i.e. protected under EU or UK legislation) across the wider site and to determine habitat value. These surveys have informed proposals for mitigation and management which are outlined in the BAP. Of particular

relevance, is the creation of an area of new woodland/parkland (of at least equivalent area as the application site) to the east of Lin Brook which is proposed as part of a package of measures to mitigate the impact of the residential development.

7.7 A number of other mitigation measures are proposed by the surveys which accompany this application and will be incorporated into the BAP. Examples that will be implemented across the wider site have been highlighted at paragraph 5.25. In addition, and of relevance to this application:

- 1 there will be no disturbance of the soil for an appropriate circumference about retained trees in order to prevent root damage;
- 2 veteran trees within and adjacent to the application site will be fenced off to allow them room to grow and for leaves/branches to fall and decay without disturbance;
- 3 any vegetation clearance (including scrub, grassland and trees) will be carried out, outside the bird nesting season;
- 4 during the construction phase any open excavations will either be closed overnight or a ramp will be placed within the holes to ensure that any hedgehogs that have accidentally become trapped can escape; and
- 5 a range of bird and barn owl nest boxes will be erected on selected trees in appropriate locations.

7.8 The results of the Invertebrate Survey suggest that the application site is of low conservation importance but it was undertaken in January which is outside the normal fieldwork season. The FA will, therefore, undertake a further survey during April to September and any necessary mitigation measures will be incorporated into the BAP. Bat survey work, to confirm the presence or absence of bat roosts, will also be undertaken prior to the removal of any trees.

7.9 The ES that accompanies the NFC application, and the BAP, demonstrate that the mitigation and management measures that have been proposed will ensure that any adverse effects are minimised and that biodiversity is enhanced. Also, the preparation of a BAP for the wider site will further the aims of the BAP covering the Borough in accordance with LP policy NE9 (Biodiversity). This approach is entirely in accordance with development plan policy.

8.0

Landscape and Visual Effects

8.1

RSS Policy QE6 (the conservation, enhancement and restoration of the Region's Landscape) and LP Policies NE4 (Landscape Protection, Enhancement and Restoration) generally seek to ensure that development is informed by, and is sympathetic to, the character of the surrounding landscape. LP Policy BE2 (National Forest: Built Development) places particular emphasis on the need for high quality development which reflects the architecture of the Forest setting. The DAS explains the effects that the residential development could have on the landscape character and views and confirms that the detailed design will have regard to relevant principles including the need to ensure that the scheme is assimilated into the National Forest.

Visual Role

8.2

The application site has only a limited visual role in the surrounding area, beyond St George's Park. From the north views of the site are screened by groups of mature trees and the undulating topography. From the north west, along the public footpath which follows the eastern side of the airfield, there are views of the hedgerow which forms the northwest boundary of the application site and the trees within the NFC site beyond. From the south, the southern end of the residential site is clearly seen from the public footpath between Scotch Hill and Linthurst Farm.

8.3

Within St George's Park, the housing development will be prominent from a range of locations along the access road.

Effects

8.4

The proposed residential development would introduce a series of buildings into an existing open area of St George's Park. There is potential for boundary treatment to gardens to result in enclosure and give rise to an incongruous suburban landscape character within this part of St George's Park character area. This would, in combination with the revised proposals for the NFC negatively affect the existing landscape character. There is also the potential for localised negative effects on the wider agricultural hinterland character as a result of incongruous suburban features in views.

8.5

Elements of the loosely spaced dwellings could be glimpsed through existing tree groups to the north of the application site. Views from the footpath to the north west are also likely to be affected. However, dwellings within the site will reduce in prominence as the boundary hedgerow matures. There is also the potential for the proposed residential development to have a negative effect on night time in views from the north as a result of light from within dwellings being introduced to an otherwise dark scene.

- 8.6 Any views of the site from the south would be set in the context of the revised proposals for the NFC and would form a comparatively small element in the view. The effect on these views of the residential development is therefore, likely to be low.

Mitigation

- 8.7 Potential effects identified above could be substantially reduced through sensitive mitigation. The DAS explains that the following measures will be incorporated:

- 1 restrict development height to 11.5 metres across the site;
- 2 restrict development height to 1 or 2 storeys on plots adjoining the northern and western boundary;
- 3 screen planting along the western boundary (at least 5 metres);
- 4 development in plots adjoining the landscape buffer on the western boundary to be set at least 15 metres from the landscape buffer;
- 5 soft boundary treatment around the southern edge of the site of sufficient width to provide screening; and,
- 6 sensitive boundary treatment to include soft boundary treatment to the west end of the site or tree planting to screen boundary walls.

- 8.8 At detailed design stage the reserved matters should seek to:

- 1 setting building into the natural slope of the site;
- 2 use of dark coloured roofing materials and avoidance of light coloured walling materials; and,
- 3 avoid positioning any focal points (above 11.5 metres) on the northern or western boundary of the site.

- 8.9 Subject to the above mitigation being adopted there are unlikely to be any significant residual negative effects as a result of the residential development. However, there will remain a change to the landscape character of the St George's Park site which, although negative in terms of the existing parkland, is localised and is not significant in the context of the revised proposals for the NFC.

9.0

Sustainable Construction

9.1

East Staffordshire is applying the provisions of Policy SR3 (Sustainable Design and Construction) in the RSS '*Phase Two Revision Draft Preferred Option*' (December 2007). It requires Local Planning Authorities to ensure that new buildings are designed and constructed to the highest possible environmental standard, working towards the achievement of carbon neutral development through compliance with a range of criteria. A number of the criteria cannot be met because detailed design has not been worked up for the purpose of this outline application. That aside, the Sustainability Statement addresses relevant criteria where it is possible to do so. For example:

- 1 the West Midlands Sustainability Checklist has been completed (at Appendix A of the Sustainability Assessment) and, based on the nine applicable questions, it confirms that the predicted score for the proposed residential development is 66% which is a 'good' rating;
- 2 a Code for Sustainable Homes pre-assessment has been carried out which establishes a route towards achieving a high level 3 rating;
- 3 The FA expects that a Site Waste Management Plan will need to be prepared in order to discharge a condition should planning permission be granted;
- 4 Sustainable Drainage Systems will be incorporated (see Section 10);
- 5 the Lifetime Homes standards will be achieved for all dwellings to ensure that any home can be adapted in the future to meet the changing needs of its occupants; and
- 6 the indicative layout incorporates passive energy measures such as orientating buildings to allow good levels of daylight, shading in summer months and the potential for winter solar gain to offset some heating requirements.

9.2

Other requirements can be addressed at the detailed design stage and the Sustainability Statement refers to a range of opportunities that could be incorporated to promote sustainable construction and energy efficiency including:

- 1 the specification of water efficient sanitaryware, including low, dual flush toilets and limited flow rate for basin taps and showers;
- 2 a commitment to sustainable procurement and sourcing;
- 3 the use of renewable or low carbon energy equipment to meet at least 10% of the development's residual energy demand;
- 4 improved specification for the houses including:
 - i improved U-Values of building fabric materials
 - ii high efficiency gas condensing boilers (90%)
 - iii improved air tightness
 - iv at least 75% energy efficient internal light fittings

- v the use of A-rated appliances
- 5 Photo Voltaic installation which could provide the necessary emission reduction to achieve both the Code level 3 requirements and a 10% CO₂ reduction in total emissions; and
- 6 fully installed water butts to collect surface run off from roofs and provide recycled rainwater to every household for irrigation and car washing purposes.

9.3

With these measures in place, and the consideration of other measures as detailed design is work up, the residential development will be able to meet, if not exceed relevant sustainable construction criteria.

10.0 Other Material Considerations

Noise

- 10.1 LP Policy NE18 (Noise) reflects the requirement of Planning Policy Guidance Note 24 (PPG24) on 'Planning and Noise' (1994). PPG24 introduces the concept of Noise Exposure Categories (NECs), ranging from A - D, to help Local Planning Authorities in their consideration of applications for residential development near transport-related noise sources. Category A represents the circumstances in which noise is unlikely to be a determining factor, while Category D relates to the situation in which development should normally be refused. Categories B and C deal with situations where noise mitigation measures may make development acceptable.
- 10.2 In this instance, the location of the application site is such that it will be subject to noise from road traffic, aircraft and people using the football pitches. Noise levels have been monitored over several days at locations close to the existing access with the B5234 and to the south of the application site (close to the boundary with Tatenhill airfield). Measurements have also been taken from a location close to one of the pitches during a match. The measurements have been used to model NECs across the application site. The model assumes a worst case scenario (i.e. ground surface assumed to be acoustically reflective, all pitches assumed to be in use at the same time and all aircraft assumed to be twin engine). Appendix C in the Noise Assessment shows that 27 of the 28 dwellings (based on the indicative layout plan) will be entirely within NEC B. NEC B states that:
- "Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection against noise."*
- 10.3 The modelled noise level at the rear façade of the dwelling on Plot 4 is 63.2 dB which is just within NEC C. Due to the margin of error in noise modelling, and the fact that a worst case scenario has been applied, it would be common practice to round down. This would mean that the predicted noise level in this location is 63 dB which is at the upper limit of NEC B. That aside, the dwellings shown on the indicative layout plan are not fixed.
- 10.4 'Mixed source' NECs have been applied to take account of noise from a number of sources and as a worst case scenario (because noise thresholds are lower). NECs for 'air traffic' could have been applied given that air traffic is the prevailing noise source in this location. The maximum threshold for NEC B in the air traffic category is 66 dB i.e. higher than the noise levels that were recorded on site. This would have placed the whole of the application site in NEC B.

- 10.5 Modelling and NECs provide a relatively simple initial assessment of noise impacts. The principal issue is ensuring that satisfactory internal noise levels can be achieved. The Noise Assessment confirms that to achieve 'good' internal noise levels of 30 dB (in accordance with British Standard 82233), glazing with an Rw+Ctr performance level of 33dB would be required for living areas of all proposed residential dwellings. This may be achievable by high quality thermal double glazing that is fitted with effective seals, or standard thermal glazing supplemented with secondary glazing.
- 10.6 The Noise Assessment concludes that it will be necessary to provide the proposed residential dwellings with a form of ventilation so that properties can be ventilated without the need to affect internal noise levels by opening windows. The acoustic ventilation could be in the form of forced draught ventilation but the more preferable option in terms of cost and energy efficiency would be the use of simple passive acoustic vents, controllable by the occupants, and either incorporated into the glazing design or as stand-alone units through the masonry. The units should be capable of providing the same acoustic insulation performance as the glazing. With these measures in place, acceptable internal noise levels can be achieved. This is entirely in accordance with PPG24 and LP Policy NE18.

Transport and Accessibility

- 10.7 The Transport Statement (TS) analyses the number of trips that are likely to be generated by the residential development relative to both existing traffic flows along the B5234 and assuming the completion of the revised proposals for the NFC. It concludes that the residential development will have only a negligible impact on traffic flows during morning and evening peak periods. This means that the amount of traffic that is likely to be generated by the residential development in addition to the traffic that is likely to be generated by the revised proposals for the NFC will be imperceptible.
- 10.8 Access to the wider site from the B5234 was improved following the grant of planning permission in 2001. The capacity of the access has been reassessed to take account of traffic that is likely to be generated by the residential development and assuming the completion of revised proposals for the NFC. The TS concludes that, as a result of the works that were undertaken in 2001, the existing access does not need to be altered as part of this application.
- 10.9 A Travel Plan is not required for a development of this size. However, The FA recognises that established planning policy seeks to reduce the need to travel, particularly by private car. The TS therefore, confirms that future residents may be able to benefit from the measures that will be worked up in the Travel Plan as part of the NFC application. This might include, for example, the use of a dedicated shuttle bus service to/from the railway station in Burton. Also, the Sustainability Assessment notes that the garages of residential dwellings will incorporate cycle storage facilities.

Flood Risk

- 10.10 LP Policy NE26 requires a Flood Risk Assessment (FRA) of proposals that have the potential to generate significant volumes of surface water runoff due to their size. This is in accordance with Planning Policy Statement 25 (PPS25) on 'Development and Flood Risk' (June 2008). PPS25 requires a Flood Risk Assessment (FRA) to be submitted alongside planning applications in areas that are known to be at risk of flooding (within Flood Zones 2 or 3) and/or are greater than 1 hectare in area.
- 10.11 In this instance, there are no watercourses within or immediately adjacent to the application site. For this reason, it is shown on the Environment Agency's Flood Maps as being within Flood Zone 1. This means that the annual risk of flooding on the site is low (i.e. less than 0.1%).
- 10.12 The application site area is, however, greater than 1 hectare and the residential development will result in an increase in impermeable surfaces. A FRA has therefore, been undertaken. It confirms that rainfall runoff rates will increase as a result of the residential development and that this will need to be mitigated. It is proposed that Sustainable Drainage Systems (SUDS) are used on site to manage the flow of surface water through to the Lin Brook. The SUDS are subject to detailed design but the general strategy is explained in the Preliminary Foul and Surface Water Drainage Strategy appended to the FRA. They are expected to include:
- 1 shallow roadside swales and filter drains to accept runoff from the road surface;
 - 2 permeable surfaces for private driveways;
 - 3 roofs will discharge via a piped system into adjacent swales (and water butts could be provided to allow roof water to be utilised for domestic/garden use);
 - 4 a pond to the south east of the development with swales to first discharge to the pond (with allowances for fluctuations in water level in order to provide some surface water attenuation); and
 - 5 a number of deeper swales are proposed to the slope between the hotel and sports buildings and the Lin Brook (within the red-line boundary).
- 10.13 The FRA notes that post-development, the SUDS will ensure that the rainfall runoff rates and volumes do not increase relative to existing conditions. Furthermore, the proposed residential development will not have a detrimental effect upon conditions downstream of the application site as discharges to the Lin Brook will be limited to current greenfield runoff rates.
- 10.14 In accordance with Environment Agency requirements, an allowance of 30% increased peak rainfall intensity has been included within the surface water drainage strategy to account for potential climate change.

10.15

There is no local sewer network in the immediate vicinity. This application therefore, proposes that foul water is treated on site by a new waste water treatment plant (which will be underground). Subject to the agreement of The Environment Agency, it is anticipated that treated water will be discharged into the Lin Brook. With this strategy in place, the FRA concludes that the risk of flooding from sewers will be low.

11.0

Conclusions

11.1

The FA secured planning permission for the development of the NFC at St George's Park in 2001. The 2001 planning permission has been implemented and could be completed at any time. There have not been any material changes in planning policy since 2001, and we conclude therefore, that the wider site continues to be suitable for the development of the NFC as a matter of principle.

11.2

The 2001 planning permission did not envisage the need for enabling development to deliver the NFC and did not incorporate any housing to the north west of the wider site (albeit the expired 1991 permission did). Since that time, The FA's operational, funding and business plans have changed.

11.3

At a general level, the development of housing on a 'greenfield' site, which is neither within, or adjacent to, a defined development boundary would not be in accordance with established planning policy. Enabling development is contrary to established planning policy but is permitted because it enables the delivery of benefits that clearly outweigh any harm that might be caused, and which would not otherwise be achieved if the development did not come forward.

11.4

This Planning Statement concludes that the residential development is enabling development and that by enabling the delivery of the NFC, a number of very important planning benefits would arise. These include:-

- 1 the creation of employment opportunities and additional expenditure in the economy;
- 2 contributions to National Forest objectives;
- 3 long term ecological and landscape enhancement;
- 4 improvements to the distribution and provision of high quality pitches and associated facilities through the provision of 3 pitches for use by the community;
- 5 increasing the demand for, and participation in, sport;
- 6 assisting in improving the health and well-being of residents by providing sports and physical activity opportunities;
- 7 raising the profile of the Borough; and, of course
- 8 contributing to national/international sporting success.

11.5

Furthermore, and having established the enabling case, this Planning Statement, and the documents that accompany the application, confirm that the housing development has been carefully conceived to minimise the impact of development on interests of acknowledged importance. They demonstrate that through appropriate mitigation and management, the revised proposals accord with policy requirements relating to:

- 1 trees and biodiversity;
- 2 visual and landscape effects;

- 3 the National Forest; and
- 4 sustainable construction.

11.6 Moreover, technical issues relating to flood risk and noise have been thoroughly addressed.

11.7 Overall, we conclude that the benefits that St George's Park will bring the local area and the Region are significant and will outweigh any residual harm.

Appendix 1 Framework for Biodiversity Action Plan

**baker
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gillespie**

ECOLOGICAL CONSULTANTS
Limited Liability Partnership

**St George's Park, Burton-on-Trent
Biodiversity Action Plan Summary**

February 2010

Final

baker shepherd gillespie

ECOLOGICAL CONSULTANTS
Limited Liability Partnership

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Report Contents

1	Introduction	1
1.1	Background.....	1
1.2	2010 Approach	1
2	UK and Local Biodiversity Action Plans	1
3	Ecological Management & Enhancement Proposals	2
3.1	Grazed Parkland	2
3.1.1	Grassland Grazing	2
3.1.2	Grazed Parkland Trees	3
4	Parkland Creation	3
5	Wood Pasture	4
5.1	Veteran Trees.....	4
5.2	Grassland Management.....	4
6	Arable Habitat	5
7	Unimproved Neutral Grassland	5
7.1	Restoration of Grassland	6
7.2	Post-restoration Grassland Management	6
7.3	Management of Trees	6
7.4	Sub-surface Drainage Structures	6
7.5	Swale Construction and Grassland Translocation.....	6
8	Wetland Habitats	7
8.1	Lin Brook.....	7
8.2	Lin Brook Ponds.....	7
8.3	Lin Brook Carr Woodland	8
8.4	Lin Brook-Off-line Pond Restoration.....	9
8.5	Pond Creation.....	9
8.6	Wetland Habitat Creation.....	9
9	Hedgerows	9
10	Woodland Habitats	10
10.1	Kidney Plantation (TN3).....	10
10.2	Oak Copse (TN4)	10
10.3	Wellingtonia Stand (TN5).....	11
10.4	Byrkley Gorse (TN6).....	11
10.5	Northwest Woodland (TN7).....	11
10.6	Southwest Woodland (TN8).....	11
10.7	Copse 1 (TN9).....	12
10.8	Copse 2 (TN10) and Copse 3 (TN11).....	12
10.9	New Tree Planting	12
11	Infrastructure Planting	12

- 12 Species Management 12**
 - 12.1 Bats 12
 - 12.2 Birds 13
 - 12.3 Barn Owl 13
 - 12.4 Brown hare 13
 - 12.5 Great crested newts 13
 - 12.6 Invertebrates 13
- 13 Monitoring 14**
 - 13.1 Habitats 14
 - 13.2 Species 14
 - 13.2.1 Bats 14
 - 13.2.2 Birds 14
 - 13.2.3 Barn owl 14
 - 13.2.4 Great crested newt 14
- 14 Appendix 1 Phase 1 Habitat Plan 15**
- 15 Appendix 2 Great Crested Newt Receptor Site Habitat Creation Proposals 16**

1 Introduction

1.1 Background

The FA purchased Byrkley Park in 2001 and in the same year secured planning permission for the development of the National Football Centre (NFC). A number of pitches, the access road, internal estate roads and other structures have been constructed; however development was halted in 2004. A S106 Agreement, dated 14th September 2001, forms part of the planning permission and requires the implementation of the Landscape and Ecology Management Plan (LEMP) in accordance with its programme of implementation. This LEMP was adopted both during the construction period and for a 20 year period following construction. The LEMP was then to be reviewed three times on a 5 yearly basis, in collaboration with relevant bodies and interested parties, including East Staffordshire Borough Council (ESBC), Staffordshire County Council Ecologist, Natural England, Staffordshire Wildlife Trust (SWT), The Woodland Trust (WT), The National Forest (TNF), The Environment Agency (EA) and the Ancient Trees Forum (ATF).

1.2 2010 Approach

A new planning application for development of the NFC at St George's Park (formerly Byrkley Park) is to be submitted in 2010. As part of this new planning application it is proposed that, following consultation with Staffordshire Wildlife Trust, a new approach is taken to protect and enhance biodiversity at the site. It is proposed that a site specific Biodiversity Action Plan (BAP) is developed for the site, in consultation with the parties listed in Section 1.1 above, to produce a new working document that is directly linked to the Staffordshire and National Forest BAP.

The aim of this summary document is to provide an overview of the ecological management strategy and enhancement proposals for inclusion with the planning application, in advance of the preparation of the full and complete document that will be submitted prior to determination. The complete document will set out management prescriptions with annotated plans.

The document provides management proposals for each habitat type and particular species found within the study site, but in some cases, more than one option is suggested, in order to provide a flexible approach to management.

2 UK and Local Biodiversity Action Plans

The Government has drawn up a national strategy to conserve our threatened native species and habitats-The UK Biodiversity Action Plan (BAP). By the year 2006, 391 Species Action Plans, 45 Habitat Action Plans and 162 Local Biodiversity Action Plans had been produced with targeted actions. Priority habitats within the UK Biodiversity Action Plan which are of relevance to the site:

1. Hedgerows
2. Lowland mixed deciduous woodland
3. Open mosaic habitats on previously developed land
4. Wood pasture and parkland
5. Ponds
6. Lowland meadows.

Priority species that are of relevance to this site include:

1. Great crested newt
2. Common toad
3. Brown hare
4. Hedgehog
5. Noctule
6. Brown long-eared

7. Soprano pipistrelle
8. Yellowhammer
9. Grey partridge
10. Dunnock
11. Bullfinch
12. Song thrush

At a local level two Biodiversity Action Plans exist for the County of Staffordshire, the Staffordshire and National Forest BAPs. Priority species (in addition to those covered under the UK BAP) which are included in these BAPs and are of relevance to the site include:

1. Farmland seed-eating birds (linnet, reed bunting, tree sparrow, bullfinch);
2. Barn owl.

3 Ecological Management & Enhancement Proposals

Refer to Appendix 1 Phase 1 Habitat Plan where appropriate.

3.1 Grazed Parkland

3.1.1 Grassland Grazing

It is anticipated that this habitat will continue to be managed by livestock grazing following completion of the proposed development. The existing grazier manages the land under the Countryside Stewardship Scheme (CSS), which has led to a gradual reduction of grazing pressure and applications of herbicide and fertilizer. It is anticipated that following the proposed development, the remaining areas of grazed parkland habitat will be managed by summer grazing with suckler cows at a rate of one cow per hectare, for a period of 24 weeks, as specified by the existing CSS agreement. Furthermore, it is anticipated that financial support for low intensity grazing can be obtained through the Environmental Stewardship, Entry Level Scheme (ELS)¹, Options EK2 or EK3, and possibly EK5, once the period of CSS support has finished.

Alternatively, following completion of the proposed development, if grazing with suckler cows is no longer feasible, sheep grazing should be considered, at a rate of four sheep per hectare, for a period of 24 weeks.

Combinations or rotations of livestock such as mixed sheep and cattle grazing, or cattle grazing followed by sheep grazing can also be considered, but it is essential to maintain low intensity grazing during summer months. If the grazing period is extended beyond 24 weeks, then the number of livestock should be reduced accordingly. Likewise if the grazing period is reduced below 24 weeks, then the number of livestock should be increased.

The livestock grazing system will follow the CSS guidelines, but the selected system will be determined to some extent by livestock availability and the prevailing weather conditions from year-to-year.

Fertiliser will no longer be applied to the grassland, following completion of the proposed development, because it is anticipated that the grassland will be sufficiently fertile to support the proposed livestock grazing intensity.

Weed control by herbicide application will be required at regular intervals. If the cover of agricultural weeds exceeds 10% of the total area, then herbicide application will be necessary. A broadleaved herbicide can be applied by spot-treatment with a knapsack sprayer, but for larger

¹ Natural England, (2010). Entry Level Stewardship: Environmental Stewardship Scheme (Third Edition). Natural England, Peterborough.

patches of weeds, a tractor-mounted, weed-wipe boom should be used. It is important to avoid the use of boom sprayers, because these may also kill lower-growing, desirable herbs.

3.1.2 Grazed Parkland Trees

Given the recommended grazing regime, it is anticipated that the stock of trees will not be adversely affected by the presence of livestock. Although livestock will readily browse leaves and shoots of trees within their reach, at the low grazing intensity that is proposed above, it is likely that the accessible branches will be at worst case, lightly browsed. In addition, the existing tree stock would have developed in the presence of livestock and exclusion of livestock from veteran trees is not considered necessary. This is because most veterans have an open canopy that affords little protection for livestock and it is usually the mature trees with a full canopy that are preferred by livestock. The presence of livestock below mature (non-veteran) trees will compact soils and damage bark and roots, but this can be favourable to promote the onset of tree senescence and the development of features such as stag-heading and limb-loss, which are associated with veteran trees.

The ELS provides financial support for the conservation of trees within grassland – Option EC2 and the HLS provides financial support for maintenance of parkland habitat (Option HC12). To achieve this option it will be necessary to stop fertiliser application below and up to 2m beyond the canopy of the tree and leave fallen timber in-situ. In addition, supplementary feeding sites and stored materials cannot be placed within the protected area.

In order to maintain a supply of mature trees to replace eventual losses, native trees (mostly pedunculate oak *Quercus robur*) will be planted in formal blocks at strategic locations throughout the habitat. Three small blocks of native trees will be planted close to the west side of the Lin Brook. These small plantations will be planted to provide potential terrestrial refuges and stepping stones to enhance dispersal options for the population of great crested newts that will be translocated to receptor sites close to the east bank of the Lin Brook (see Appendix 1). Individual trees will be protected from small mammals and supported and managed annually for a period of five years to ensure successful establishment.

4 Parkland Creation

It is anticipated that part of the arable habitat to the east of the Lin Brook will be converted to parkland habitat, in order to mitigate the proposed residential development located within an area of existing parkland, to the north-west of St George's Park. At this stage the area allocated for mitigation has not been fully determined, but it is anticipated that 4ha of parkland habitat will be created, plus an additional 2ha of wetland habitat, which will be created on the north-west side of the Lin Brook. The primary function of the wetland habitats will be to treat surface water drainage from a proposed housing development, but with careful design, there is potential to provide habitat(s) of ecological interest, for example reed bed and marshy grassland. Whilst at this stage there is only a proposal to create 4ha of parkland, it is a long-term aspiration to create further parkland habitat to the east of the Lin Brook.

There are no ELS options for the conversion of arable land to parkland habitat, but financial support may be available through the Environmental Stewardship Higher Level Scheme (HLS)² – Option HC14 and also funded by a Capital Works Plan. To create parkland, it will be necessary to create species-rich grassland and plant native trees of local provenance. During the first year after sowing, the grassland will require intensive management in order to promote the growth of wildflowers and control the more vigorous grass seeds. After planting, trees will require a period of five years of regular maintenance post-establishment management will follow the same regime as that for the established parkland habitat.

² Natural England (2010). Higher Level Stewardship: Environmental Stewardship Scheme (Third Edition). Natural England, Peterborough.

The creation of parkland will be of benefit to a number of species including **brown hare, bats and birds.**

5 Wood Pasture

5.1 Veteran Trees

This area supports a high number of veteran trees and many mature trees that are approaching veteran status. The condition of veteran and near-veteran trees should be monitored, but intervention is not considered to be necessary. However, mature trees that are diseased, or appear likely to die well-before reaching veteran status, should be felled and the timber removed, to reduce the risk of cross infection.

Fallen branches up to 15cm diameter should be collected annually at the beginning of spring and stacked into cords³, which are scattered throughout the pasture. Larger branches, will be left where they fall, but if necessary, they will be moved closer to the tree trunk (to avoid snagging mowing equipment, see section 6.2).

Although there are sufficient mature trees with potential to become veterans in the short-term (<100years), immature and semi-mature trees are not present. In the long-term, this could result in a loss or reduction of the veteran tree resource, because replacements for dead veteran trees are not present. To ensure continuity of veteran and mature trees it is recommended that a programme of natural regeneration is carried out over a twenty year period.

This can be achieved by the creation of enclosures which are left unmanaged for a period of three years. Six enclosures should be located in areas of wood pasture where tree density is lower than average. Each enclosure should be at least 250m² and can include existing trees. The enclosure can be created by the erection of temporary post and wire mesh fencing. Following construction, the enclosure should be left unmanaged for three growing seasons and inspected during the autumn of year three. During the inspection of each enclosure, an appropriate number of naturally-regenerated tree seedlings will be selected for retention and 'growing on'. The number of selected seedlings will be 50% greater than the desired total, to allow for future losses. If the density of young trees remains too high selective thinning will be carried out to achieve the desired density. Pedunculate oak seedlings will be favoured, because it is the species that is most likely to achieve veteran status and the species supports more invertebrate species than any other native tree or shrub.

5.2 Grassland Management

It is anticipated that management of the grassland by grazing will not be an option for this habitat, because of its location relative to the existing and proposed developments. As a consequence, it will be necessary to implement a cutting regime that promotes the development of a botanically diverse grassland community. In the long-term, it is expected that the management treatment will promote natural colonisation from neighbouring areas of grassland and enhance the botanical diversity of the community.

Wood pasture grassland is traditionally managed by grazing, but there are Scandinavian examples that are managed for hay production, which have produced botanically species-rich sites of significant ecological interest, Peterken 2008⁴. Management of the grassland complies with HLS – Option HC12, if there are no inputs of artificial fertiliser. There is also the HLS hay-making option HK18, which is a discretionary option for high value grassland or grassland with potential ecological interest. Although, hay or silage productivity is likely to be fairly low without fertiliser applications, there should be sufficient material to make hay production a financially

³ A cord is a rectangular enclosure that is 8' long, 4' wide and 4' high, with posts at each corner, which conforms to approximately two tonnes of cut timber. In this case, cut timber (<8' long) is stacked up to a height of 4' and allowed to decay, with fresh materials placed on top at regular intervals.

⁴ Peterken, G. (2008). Woodland origins of meadows. *British Wildlife* Vol. 20, pp161-170.

viable exercise. The grassland will be cut two times each year, the first cut being early to mid-July depending on sward condition and weather conditions, with a follow-up cut during late August or early September to remove any late summer growth and control late-flowering agricultural weeds such as docks. If there is insufficient growth for hay or silage production, clippings will still have to be removed from the grassland. It is important to note that the areas of grassland surrounding the tree trunks are likely to support fallen timber and will have to be avoided by mowing and bailing equipment. Patches of grassland with fallen timber should be marked by using painted wooden fence posts that are clearly visible from a tractor.

It may be necessary to control agricultural weeds by the application of selective herbicides if the cover of weeds exceeds 5% of the grassland area. Section 3.1.1 describes herbicide application options.

6 Arable Habitat

In order to enhance the ecological value of arable habitat within the study site it is recommended that the cultivation regime is changed from winter-sown to spring-sown crops with the habitat left uncultivated over the winter period. The ELS provides financial support for a range of options including:

Provision of buffer strips/beetle banks (6m wide grass strips) – Option EE3. The 6m strips will be sown with a grass seed mix around the perimeter of the fields and the small islands of plantation woodland scrub, in order to buffer the impacts of arable cultivation from neighbouring semi-natural habitats and to soak up surface water run-off from the field before it drains into the Lin Brook. These will provide suitable habitats for invertebrates such as spiders and ground beetles, and will provide suitable habitat for foraging birds such as barn owl and kestrel and nesting habitat for species such as grey partridge.

Over-winter stubble – Option EF6. This option will require a change to spring-sown crops. To comply with the option it is necessary following harvest, to leave the stubble uncultivated until the following spring. In addition, no fertiliser / herbicide application will be carried out over the winter. This would provide suitable habitat for lapwing and skylark, and also habitat for brown hare.

It is anticipated that in the short-term, the tenant farmer will continue with the existing arable cropping system for the duration of the Countryside Stewardship agreement. Thereafter, the tenant farmer will be encouraged to adopt Environmental Stewardship options, but with the eventual aim, after approximately 5 to 15 years, of conversion of 24.5 hectares of arable habitat to parkland habitat.

This will be of benefit for **brown hare, bats, invertebrates and farmland seed-eating birds.**

7 Unimproved Neutral Grassland

An extensive area of neglected unimproved neutral grassland is located on the east-facing slopes, to the west of the Lin Brook. Most of the grassland supports an assemblage of species, which indicates damp soils, but the south end of the grassland to the east of the Oak Copse includes an area of grassland that is kept permanently wet by a spring-line. The vegetation is indicative of wet, seasonally inundated soils and includes species such as rushes *Juncus spp.*, ragged robin and creeping bent grass *Agrostis stolonifera*. Despite a period of neglect, the grassland habitat retains a relatively good number of typical grassland plants.

With management, there is potential to restore the neutral grassland to a more species-rich state that would provide suitable forage material for grazing livestock. It is anticipated that restoration will revert the sward from the existing MG1 False-oat grassland community to the MG5 Crested dog's-tail – black knapweed grassland community, which is the characteristic agriculturally-unimproved neutral-grassland community of clay soils in the Midlands.

7.1 Restoration of Grassland

The HLS can provide financial support for the restoration of species-rich grassland (Option HK7), which will require control of bramble scrub, tall-herbs and bulky, tussock-forming grasses. Control can be achieved by mowing the existing sward and removing the clippings, followed by a period of intensive grazing, for example a 12 week period of grazing at 4 cows (or 16 sheep) per hectare. Intensive grazing by cattle will trample and break up the sward to allow regeneration of desirable herbs. It may be necessary to spot-treat grassland weeds and scrub regeneration with a suitable herbicide, following the initial grazing period, if the cover of tall-herbs and scrub occupies more than 5% of the overall grassland resource.

7.2 Post-restoration Grassland Management

The HLS provides financial support for the maintenance of species-rich grassland (Option HK6), which can be managed by cutting (hay making) and/or grazing. It is recommended that the grassland is annually managed by cutting during early July to produce silage or hay, followed by a period of aftermath grazing with sheep from late July to mid October. Aftermath grazing will be implemented at 16 sheep per hectare over a 12 week period.

To comply with HLS option HK6, the application of artificial fertilisers will not be permitted, but light applications of organic manure could be considered in future years. However, there should be no fertiliser application for a period of five years following initial restoration work, in order to reduce soil-nutrient levels and promote botanical diversity.

Option HK6 will permit control of agricultural weeds by herbicide application. Application of herbicides will follow the recommendations provided in section 2.1.

7.3 Management of Trees

The management of trees and shrubs within the grassland will follow the same recommendations as those for the parkland trees. There is no requirement for specific protection of existing trees and shrubs, because the proposed livestock grazing intensity is considered to be low enough, to not cause any significant or cumulative damage to the trees and shrubs. Further planting is not considered to be necessary, because parkland trees are plentiful elsewhere within the study site.

7.4 Sub-surface Drainage Structures

Below ground, the grassland supports a field drainage system that consists of culverts with inspection pits covered by cast-iron covers. The grassland will be surveyed to locate all of the inspection hatches and missing covers will be replaced before grassland management begins.

7.5 Swale Construction and Grassland Translocation

The proposed development requires the construction of swales to collect and treat surface drainage water before it is discharged to the Lin Brook. The swales will be located within the neutral grassland between the development and the Lin Brook and will consist of four shallow, vegetated depressions designed to intercept surface water run-off and discharge from sub-surface field drains.

The proposed development will result in the loss of a small area of marshy grassland. This grassland supports plant species that are not located elsewhere within the grassland habitat and is therefore, of ecological interest. The construction of swales will provide the opportunity to relocate the wet grassland community prior to the proposed development. Although the swales may become dry for short periods, given the surface drainage area, it is anticipated that soils within the swales will remain moist during summer months, and wet to inundated, during winter months, which will be suitable for wet grassland vegetation. Therefore, the wet grassland vegetation will be transferred as vegetation turfs, which will be laid at the base of the swales.

8 Wetland Habitats

8.1 Lin Brook

The north section of the Lin Brook above the vehicular crossing is a small stream with pool and riffle sequences, supplemented by sand and silt bars. The banks of the brook are generally steep and prone to undercutting and slumping. In places cattle have caused soil disturbance and loss of vegetation alongside the brook, but these areas are localised and not extensive. A lack of water in the north section of the brook during extended periods of drought is unlikely to have a long-term detrimental impact on its ecological interest, unless extensive sections of the brook run dry. Short periods of low (or no) flow can expose substrates, which are colonised by annual plants and specialist invertebrates. The features described above are all commonly associated with natural streams and enhance the overall ecological value. Therefore, it is considered that non-intervention is the most appropriate management option for this section of the brook. At the south end of this section of the Lin Brook, the banks and land adjacent to the brook supports unmanaged, species-poor neutral grassland with patches of scrub and scattered individual shrubs and trees, which are generally immature. The shrubs and trees should be left to grow towards maturity, but in order to arrest the spread of further scrub development it is recommended that the grassland habitat is rotationally topped⁵ at a height of 10cm. No cutting should be carried out within 2m of the bank-top and only one side of the brook should be cut in any year. Topping should be made carried out every three years and removal of cuttings is not considered to be necessary.

Although there are no proposals to modify the brook itself, native trees (of local provenance) will be planted at intervals on the banks of the brook between OS grid reference locations SK 168 238 to SK 170 239. Tree species will include holly, small-leaved lime, oak and ash. Tree planting is proposed to enhance the ecological interest of this section of the brook and to provide great crested newts with better quality dispersal and commuting routes. See Appendix 2 for the location of this planting.

8.2 Lin Brook Ponds

The south section of the Lin Brook supports two large ponds which have been formed by the construction of a series of weirs. The weirs are now in a poor state and are in need of major repair works. HLS – Option HD9 (inspection and maintenance of designed / engineered water-bodies) provides financial support for repairs to the infrastructure associated with the ponds.

Earlier versions of the LEMP included proposals for restoring the infrastructure associated with the ponds and de-silting of the pond-beds. Whilst it is recognised that de-silting can bring some ecological benefits such as improved water clarity, there is also a risk that disturbing long-established sediments can cause adverse changes to the physical structure of the ponds, the water quality and the assemblage of aquatic fauna. Given the potential for such an adverse impact, it is recommended that no action is taken to remove silts from the bed of each pond. If there are other non-ecological reasons for undertaking the work, then a more detailed study will be required, in order to fully determine the impacts of de-silting work.

The two ponds (referred to as the north and south ponds) are largely surrounded by trees and shrubs, which have developed as a consequence of a lack of bank-side management. The north pond supports a near continuous and dense strip of woodland on the west bank, which shades the shoreline and probably suppresses the growth of emergent vegetation such as reed-swamp. Selective thinning (40% removal of the existing trees and shrubs) to create gaps would enhance the structural diversity of the woodland habitat, promote the growth of aquatic marginal vegetation and provide views of the ponds from the proposed development. It is important to retain 50% of the existing trees and shrubs so that the east shore-line of the pond continues to receive some shelter from the prevailing winds. Following initial thinning and clearance work, a

⁵ Topping is a method of cutting that promotes fresh growth of grass from existing tussocks.

programme of rotational coppicing and pollarding will be carried out in order to maintain the structural diversity of the habitat and to maintain views of the lake. The east bank of the pond supports occasional trees and shrubs, which would benefit from a programme of rotational coppicing, in order to maintain the existing gaps between trees and shrubs. It is considered that the growth of aquatic marginal plants along the east shore is unlikely to occur because of wave erosion, caused by the direction of the prevailing wind relative to the east and northeast shoreline.

The south pond is virtually surrounded by broadleaved woodland with the largest area occurring on the east bank. The west bank woodland is of a similar composition to the woodland that occupies the west bank of the north pond. As a consequence, it is recommended that the woodland is managed in the same way as the north pond west-bank woodland. The larger area of broadleaved woodland on the east bank of the pond should be managed by limited intervention. The woodland habitat located within 15m of the pond margins should be managed by rotational coppicing of shrubs and trees. All trees and shrubs will be coppiced over a four year period (25% per year) and then each block will be allowed to develop for period of five years, before re-cutting. Thereafter, the coppicing work will be repeated in perpetuity. Approximately 10-15 mature, native standard trees (such as alder *Alnus glutinosa* and pedunculate oak *Quercus robur*) will be retained within the coppice strip. The retention of standards will promote structural diversity and provide habitat for species that are not generally associated with coppiced woodland stands. It is anticipated that the programme of woodland management will create a dense block of 'scrubby' woodland on the east bank of the pond, but regular cutting of this area will ensure that the margins of the pond are kept open. The removal of shading trees from the margins of the lake is likely to promote the growth of aquatic marginal vegetation along the east bank of the lake.

8.3 Lin Brook Carr Woodland

The south section of the Lin Brook flows through mature plantation woodland, which contains a range of mature native and non-native broadleaved trees and shrubs. Although the woodland has a diverse structure, it would benefit from a light thinning of non-native trees and shrubs, which cast a heavy shade and suppress the development of field layer vegetation, particularly rhododendron. However, the actual species of rhododendron have yet to be identified and before implementing any control measures, it will be necessary to determine the exact species. If the rhododendron plants are the more common species including *Rhododendron ponticum*, and *Rhododendron luteum* and the hybrid *Rhododendron ponticum* x *Rhododendron maximum*, then the control measures should aim to eradicate the species. However, if the plants are identified as rare species, hybrids or cultivars, then it will be necessary to transplant the plants to formal landscape areas within the proposed development. Thereafter all plants will be felled, and cut materials removed off-site. Regeneration will be controlled by herbicide treatment (such as ammonium sulphonate) of cut stems and follow-up treatments at regular intervals for five years.

The Lin Brook is heavily shaded by the adjacent trees and shrubs throughout this section and although some shading of water-courses and input of fallen timber and dead leaves is beneficial for wildlife, too much shade suppresses aquatic and marginal vegetation. In addition, too many fallen leaves entering the stream can raise the acidity of the water and have a detrimental impact on water quality. Therefore, a strip of four metres either side of the stream should be cleared of trees and shrubs, with the exception of selected specimens, which will be coppiced or pollarded to reduce shading of the stream. After the initial clearance, the corridor should be managed annually to maintain open conditions. Soft vegetation should be cut during late summer/early autumn and all clippings should be removed and composted (off-site or on-site). Retained, streamside trees or shrubs should be rotationally coppiced or pollarded every five to seven years depending on the extent of re-growth from cut stems.

Clearance of deadwood from the stream should be avoided unless there are flooding issues, because the pools formed by log-jams are important for specialist invertebrates. Felled timber,

should be retained within the woodland wherever possible, in order to maximise the deadwood resource, which will provide opportunities for a wide range of invertebrate species.

8.4 Lin Brook-Off-line Pond Restoration

A pond located on the east side of the Lin Brook at the north end of the site will be restored, in order to enhance its suitability for breeding amphibians and invertebrates. See Appendix 2 for the location of the restored pond.

8.5 Pond Creation

Two sites, located to the east of the Lin Brook at OS grid references SK 168 233 and SK 168 234 have been selected as receptor sites for the transfer of great crested newts and other amphibians from existing ponds, which will be destroyed as part of the proposed development of the study site. The two sites support three ponds each (each pond having a minimum area of 100m²) and will be surrounded by suitable terrestrial habitat for great crested newts including new hedgerows, scrub planting, grassland creation and tree planting (see Appendix 2).

8.6 Wetland Habitat Creation

An area of wetland habitat will be created to the north of the new hotel facility. This will include a shingle beach which will be of value to invertebrates and ground nesting birds. The new open area of water will provide suitable habitat for dragonflies and damselflies, breeding opportunities for amphibians and foraging habitat for bats. The margins of the open water will be planted with native species such as sweet flag and common reed and other aquatic species will be included. Public access will be controlled to prevent disturbance to ground nesting birds.

9 Hedgerows

The 2008 habitat survey identified six hedgerows.

A section of species-poor hedgerow with trees is located on the west boundary at the north end of the site between OS grid references SK 168 242 to SK 171 243.

Similarly, a species-poor hedgerow with trees is located on the east boundary at the north end of the site between OS grid references SK 171 238 and SK 174 242. The south end of the hedgerow connects to mature broadleaved woodland and the north end is connected to a mature oak plantation (TN7) that is next to the site entrance.

The north boundary of the site, either side of the entrance gate, supports species-poor hawthorn hedgerows between OS grid references SK 172 243 and SK 174 243. The hedgerows have been planted within the last 10 years and the plastic spiral guards have yet to be removed. The hedgerow is intact and bushy, but has been regularly trimmed.

A species-poor hedgerow occupies the west boundary at the south end of the site between OS grid references SK 159 234 to SK 159 229. The hedgerow is managed by trimming and is located alongside an immature broadleaved plantation (see section 10.9).

A species-rich hedgerow with trees and dry drainage ditch occupy the south boundary between OS grid references SK 159 229 and SK 164 226. The hedgerow appears to be managed by annual trimming.

The hedgerows should be managed by trimming every two or three years, in order to promote the production of fruits and thereby provide a winter food source for birds. The ELS offers financial support for the management of hedgerows and associated features (Options EB2, EB3, EB6 and EB7).

New hedgerows will be planted to the east of the Lin Brook as part of the terrestrial habitat creation for great crested newts. This will measure approximately 280 metres in length and consist of hawthorn, blackthorn, buckthorn, field maple, crab apple, holly, hazel, and pedunculate oak (see Appendix 2 for the location of the hedgerows).

10 Woodland Habitats

There is potential for financial support for woodland management work within the study site through national schemes such as the Forestry Commission's Woodland Grant Schemes (WGS). There could also be potential for financial support through local schemes administered by the Forestry Commission or local organisations such as the National Forest Company. Further consultation with the relevant organisations will be investigated before implementing the management proposal provided below.

10.1 Kidney Plantation (TN3)

The plantation is semi-mature (<100 years old) and consists of a mix native broadleaved and non-native broadleaved and conifer trees. The shrub layer consists of a mix of planted and regenerating rhododendron, and self-sown stands of dense bramble. Both the canopy and shrub layer cast a dense shade on the field layer and consequently botanical diversity is poor. Management of the woodland can enhance its ecological value, but in the short-term (50-100 years) is unlikely to promote the development of a desirable botanical field-layer community with typical woodland herbs such as bluebell.

However, without management, self-thinning of canopy trees will occur. Although gaps and structural diversity are of ecological benefit, in this case any gaps are likely to be colonised by the most competitive and/or invasive species. Rhododendron and sycamore are highly invasive and the creation of gaps by self-thinning is likely to promote the spread of both species. Therefore, a programme of targeted thinning of canopy trees and control of rhododendron is recommended.

Conifer stands will be gradually thinned by the removal of up to 60% of the existing resource over a 20 year period. All viable timber should be removed from site and sold, but brash can be left in-situ. Broadleaved and mixed stands will also be thinned, but sycamore will be targeted for removal rather than native species such as pedunculate oak and silver birch.

The shrub layer will be gradually cleared of bramble and rhododendron over a 20 year period. The clearance of rhododendron will be carried out over a five-year period. Each year, a third of the existing rhododendron cover will be cut and the materials collected and burned on-site at specific pre-selected locations. Cut stumps will be treated with a suitable herbicide such as Ammonium sulphonate, in order to prevent vegetative regeneration. It is anticipated that follow-up treatments by herbicide application during years four and will be sufficient to control regeneration from seed.

The removal of rhododendron is likely to provide opportunities for the further spread of bramble. Bramble is desirable in small quantities, but control will encourage botanical diversity, if shade from the tree canopy is not too extensive. Therefore, 75% of the bramble cover will be cut annually and the cuttings will be collected and burned on-site at specific pre-selected locations. The remaining 25% of the bramble cover should be retained as a few large patches, rather than numerous small stands. This will be of ecological benefit and make future control of bramble easier to carry out.

10.2 Oak Copse (TN4)

The oak copse is located in a hollow with seasonally wet soils. The canopy is dominated by mature pedunculate oaks, with small quantities of immature holly, hawthorn and rowan on the periphery of the stand. The field layer vegetation consists of commonly-occurring tall-herbs and grasses that are indicative of disturbed and/or nutrient-rich soils.

The mature oaks are the most significant ecological feature of this woodland. Some of the trees are now developing features such as stag-heading and crown-thinning, which can provide a resource for deadwood invertebrates and birds. With time, further development of deadwood features will occur and the ecological value of the trees will be further enhanced. With crown thinning and stag-heading, the canopy will become discontinuous, which will promote the growth of shrubs and trees including pedunculate oak. Therefore, unless trees become a safety risk, non-intervention management will be implemented. If trees have to be felled or de-limbed for safety reasons, then cut materials should be left in-situ, preferably at the edge of the woodland.

It is proposed that this woodland will be expanded through the planting of oak, holly and hawthorn to the west.

10.3 Wellingtonia Stand (TN5)

This plantation is a significant landscape feature and the trees are in good condition. The plantation is of low botanical interest, but is of ecological significance, because it supports a very large badger sett. As a consequence, management of the stand is not required. However, maintenance of the perimeter fence and routine inspection of the condition of the trees will be carried out. If any trees become unsafe and require removal, then a suitably qualified ecologist will be consulted, in order to ensure that the required works are carried out in a lawful manner that minimises the potential of disturbing or harming badger.

10.4 Byrkley Gorse (TN6)

The woodland is artificial in origin, but natural regeneration of native species has occurred. The canopy is dominated by common lime, with smaller quantities of sycamore and horse chestnut. Below the canopy hawthorn and blackthorn shrubs are present. To the north the canopy is less extensive and this area supports stands of scrub including hawthorn, blackthorn, bramble, and European gorse. The woodland has a relatively low floral diversity, which is typical of relatively immature (<100 years) plantations and management is unlikely to significantly increase the number of desirable plant species. However, the structural variation of the woodland is likely to provide a wide range of opportunities for fauna, particularly birds, small mammals and invertebrates. Therefore, it is recommended that the woodland is managed by non-intervention, but if any trees or shrubs located on the periphery of the woodland become hazardous, then appropriate works should be carried out to remove the hazard.

10.5 Northwest Woodland (TN7)

The woodland is a mature broadleaved plantation that consists of native and non-native broadleaved trees. The dense canopy of the trees has suppressed the development of shrub and field layers, so structural and botanical diversity are poor. Although the woodland is of relatively low ecological value, it is a prominent landscape feature and also contributes to the continuity of woodland cover in the local area. Therefore, unless there is need to manage for safety reasons, no other intervention is recommended during the lifetime of this plan.

10.6 Southwest Woodland (TN8)

This woodland is located in a valley with a stream and pond. The woodland supports a mix of mature trees and shrubs such as pedunculate oak, alder and hawthorn, and plantation trees and shrubs, which are planted higher up the slopes, or on the banks surrounding the pond. The woodland supports an active badger sett, which is probably a subsidiary sett from the main sett located in the Wellingtonia stand (TN5). Although the woodland has a fairly open canopy the mix of trees and shrubs has created a diverse structure and a dense field layer of tall-herbs, bracken and bramble. Therefore, given the presence of badger, and the existing ecological interest of the woodland, further intervention during the lifetime of this plan is not recommended.

10.7 Copse 1 (TN9)

This small stand is immature with an open canopy of hawthorn and elder and the undisturbed areas of field layer vegetation supports common nettle. The habitat is low botanical diversity, but it has ecological value, because of the presence of an active badger sett. Therefore, intervention is not recommended, other than maintenance of the perimeter fence to exclude livestock.

10.8 Copse 2 (TN10) and Copse 3 (TN11)

Both stands are small plantation woodlands surrounded by arable habitat. They are low botanical and structural diversity and consequently of limited ecological value. However, they are significant landscape features and contribute to the overall cover of woodland in the local area and could act as 'stepping stones' for the dispersal of species. Management is unlikely to significantly increase the ecological value of these stands because of their small size and composition. Therefore, intervention is not recommended unless trees become hazardous or fall into the neighbouring arable habitat. If trees or branches fall into the arable field, then these should be removed and the cut materials left at the edge of the stand, below the tree canopy.

10.9 New Tree Planting

Alongside the southeast, south-west and south boundaries of the site and close to the derelict Well-house, new woodland has been planted. The woodland consists of native broadleaved trees with a composition akin to that of semi-natural oak woodland on clay soils in the British lowlands. The plantations have been intensively managed during the early years to ensure successful establishment, but further protection and support is no longer required. Within the lifetime of this plan, the woodland will be selectively thinned to open up gaps between trees and shrubs, in order to promote the growth and development of retained trees and shrubs. It is recommended that 30% of the existing trees and shrubs are removed, targeting smaller trees and shrubs, or diseased and damaged specimens. Long-term thinning over a 70 year period will require up to 60% removal of the planted trees and shrubs.

11 Infrastructure Planting

At this stage, firm proposals for landscaped areas within the development footprint have not been finalised. However, it is anticipated that grassland areas adjacent to football pitches, on-site facilities, access roads and footpaths will be kept short for both practical and safety reasons. In addition, it is also expected that the development will include ornamental planting close to the proposed buildings, housing units and on-site facilities. The ecological interest of the development can be enhanced by the careful selection of plants. For example, avoiding varieties with sterile F1 hybrid flowers, which have no value to pollinating insects. In addition, native trees and shrubs, or trees and shrubs that produce edible fruits for birds should be included within planting schemes.

The proposed housing development will provide the opportunity to create wetland habitats within the parkland habitat. The primary purpose of the wetland will be drainage and treatment of surface waters from areas of hard-standing and grey-water that will originate from the housing development. With careful design, the wetland provides opportunities to enhance on-site biodiversity and enhance the landscape appeal of the parkland, through creation of reed-bed and open water habitat, located alongside the Lin Brook.

12 Species Management

12.1 Bats

In order to further enhance the value of the site for bats, the installation of bat boxes on selected trees within woodland and wood pasture/parkland will be carried out. Forty bat boxes will be installed, to provide roosting opportunities for a number of bat species, including pipistrelle, brown long-eared and noctule.

12.2 Birds

In order to enhance the site for birds, it is proposed that eighty bird nest boxes will be erected on selected trees within the woodlands and wood pasture/parkland habitats to provide new nesting and roosting opportunities.

The habitat creation proposals for great crested newts will include hedgerow, scrub and tree planting, which will enhance the site for nesting and foraging birds.

The new area of wetland habitat to the north of the hotel will include an area of shingle beach habitat to try to replicate the nesting habitat currently used by little ringed plover and lapwing. Public access to this area will be controlled to prevent disturbance to nesting birds and will be managed to prevent encroachment by scrub and trees.

The arable fields to the east of the Lin Brook will be enhanced for species such as lapwing, little ringed plover, grey partridge and skylark through a change to spring-sown and over-winter stubble fields.

12.3 Barn Owl

In order to enhance the site for barn owls, it is proposed that two barn owl nest boxes will be erected within the wood-pasture to the west of the site. An area of currently intensively managed grassland to the southern boundary of the site close to two football pitches will be less intensively managed to encourage small mammals and therefore provide a new foraging area for barn owl.

12.4 Brown hare

The site will be enhanced for brown hare through changes to the existing arable land and less intensive management to a strip of grassland to the southern boundary of the site.

12.5 Great crested newts

Survey work has identified the presence of a medium great crested newt population with the concrete linear ponds within the centre of the site. The development proposals will have a direct impact on these breeding ponds and associated terrestrial habitats.

To derogate from the legal protection afforded to great crested newts, a mitigation strategy has been prepared that will be submitted as part of a European Protected Species Licence to Natural England. This plan includes the creation of new ponds and terrestrial habitats, including hibernacula, scrub planting, hedgerow creation and tree planting. The receptor site will be located on the east side of the Lin Brook. For further details, see Appendix 2.

12.6 Invertebrates

The creation of new ponds to the east of the Lin Brook and a new wetland area to the north of the hotel will be of value for a range of invertebrates including dragonflies and damselflies. It is proposed that an un-vegetated invertebrate embankment, which faces east to south-east, will provide warm conditions in sunny weather, to provide a variety of invertebrate microhabitats, will be created adjacent to the new wetland area to provide replacement habitat for the loss of the existing habitat to the north of the hotel. This will provide habitat for species such as solitary bees and wasps.

The management of existing grassland as described in previous sections and the creation of new habitats such as parkland, hedgerows and scrub will have a positive impact on invertebrates.

13 Monitoring

In order to determine the effectiveness of management, key habitats and species will be monitored at regular intervals upon completion of the proposed development.

13.1 Habitats

The JNCC Common Standards Monitoring method⁶ will be used to determine the condition of a habitat type. Wood pasture, neutral grassland and Lin Brook carr woodland will be assessed during the third and fifth year upon completion of the proposed development and habitat management works. The results of the assessments will be used to review the progress of the habitat management work, and if necessary adjust the methods in order to achieve targets.

13.2 Species

13.2.1 Bats

All of the bat boxes will be inspected by a licensed ecologist, during the third, fifth, tenth, fifteenth and twenty years following installation. Any broken or fallen bat boxes will be replaced. If bats are located, details such as species, numbers and age will be recorded and the details forwarded to Staffordshire Ecological Record, Natural England and County Ecologist.

13.2.2 Birds

The bird boxes will be cleaned out every two years (outside the bird nesting season) to prevent a build up of parasites in nesting material to encourage use. Any broken or fallen bat boxes identified will be replaced.

13.2.3 Barn owl

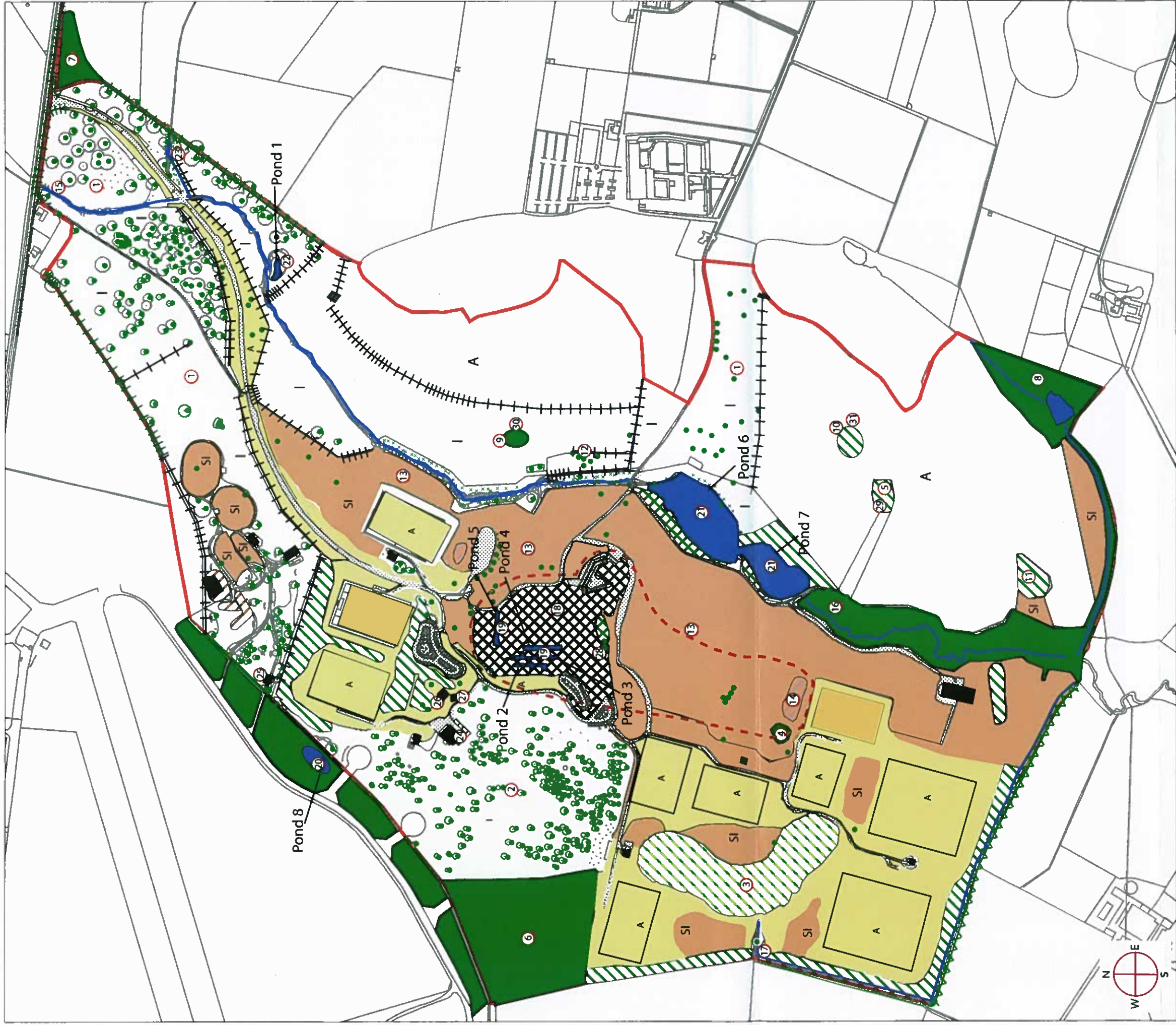
Barn owl boxes will be observed by a suitably qualified ecologist during the nesting season to determine occupancy and activity of the occupants. If barn owls are located, details such as adult numbers, observed activities and presence of chicks or immature birds will be recorded and the details forwarded to Staffordshire Ecological Record, Natural England and County Ecologist.

13.2.4 Great crested newt

The proposed translocation of great crested newts to receptor sites on the east side of Lin Brook will require population monitoring for a period of four years following translocation. Four evening visits will be made between April and June, in order to determine presence, activity and population size class. The monitoring programme is a statutory requirement of a European Protected Species Licence, which will be required to permit the translocation to proceed.

⁶ <http://www.jncc.gov.uk/page-2217>

14 Appendix 1 Phase 1 Habitat Plan



	Ownership boundary
	Target Note reference number
	Individual tree
	Scattered scrub
	Species-poor hedgerow
	Species-poor hedgerow with trees
	Running water
	Fence
	Species-rich hedgerow with trees

	Unimproved neutral grassland
	Semi-improved neutral grassland
	Marshy grassland
	Improved grassland
	Plantation broadleaved woodland
	Plantation mixed woodland
	Broadleaved woodland
	Dense scrub

	Standing water
	Amenity grassland
	Artificial football pitch
	Tall ruderal vegetation
	Ephemeral/short perennial
	Hard standing
	Building
	Development area

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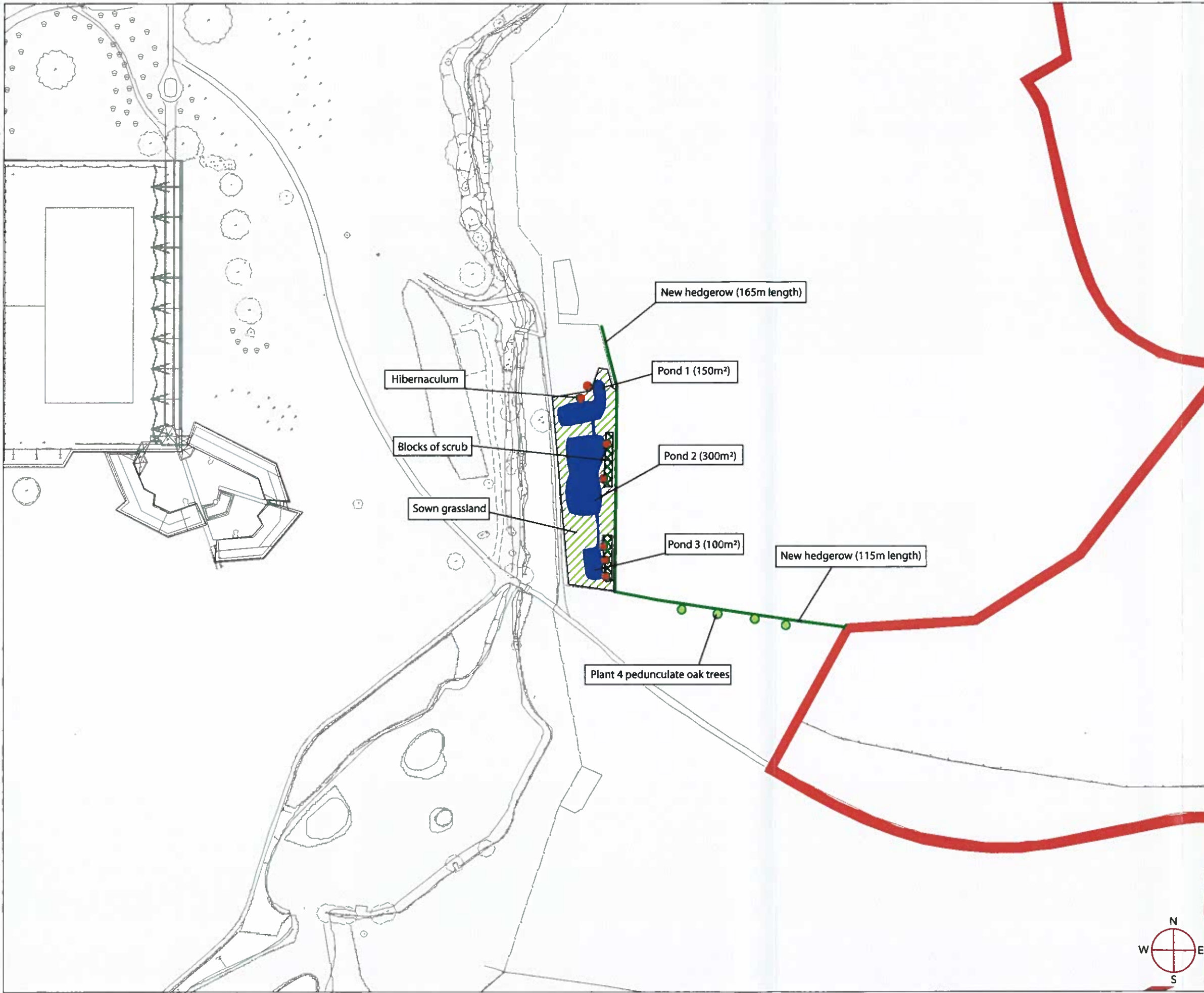
NATIONAL FOOTBALL CENTRE

Phase 1 Habitat Survey Plan and Pond Location Plan




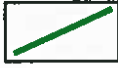


Date	JAN '10	Checked	KS	Scale	NTS
Drawn	LRJ	Approved	KS	Job Ref	3776
Amended	SM	Status	FINAL	Dwg No.	FIGURE 2

15 Appendix 2 Great Crested Newt Receptor Site Habitat Creation Proposals





Key

-  Pond
-  Sown grassland
-  Scrub
-  Hedgerow
-  Tree
-  Hibernaculum

New hedgerow (165m length)

Hibernaculum

Blocks of scrub

Sown grassland

Pond 1 (150m²)

Pond 2 (300m²)

Pond 3 (100m²)

New hedgerow (115m length)

Plant 4 pedunculate oak trees



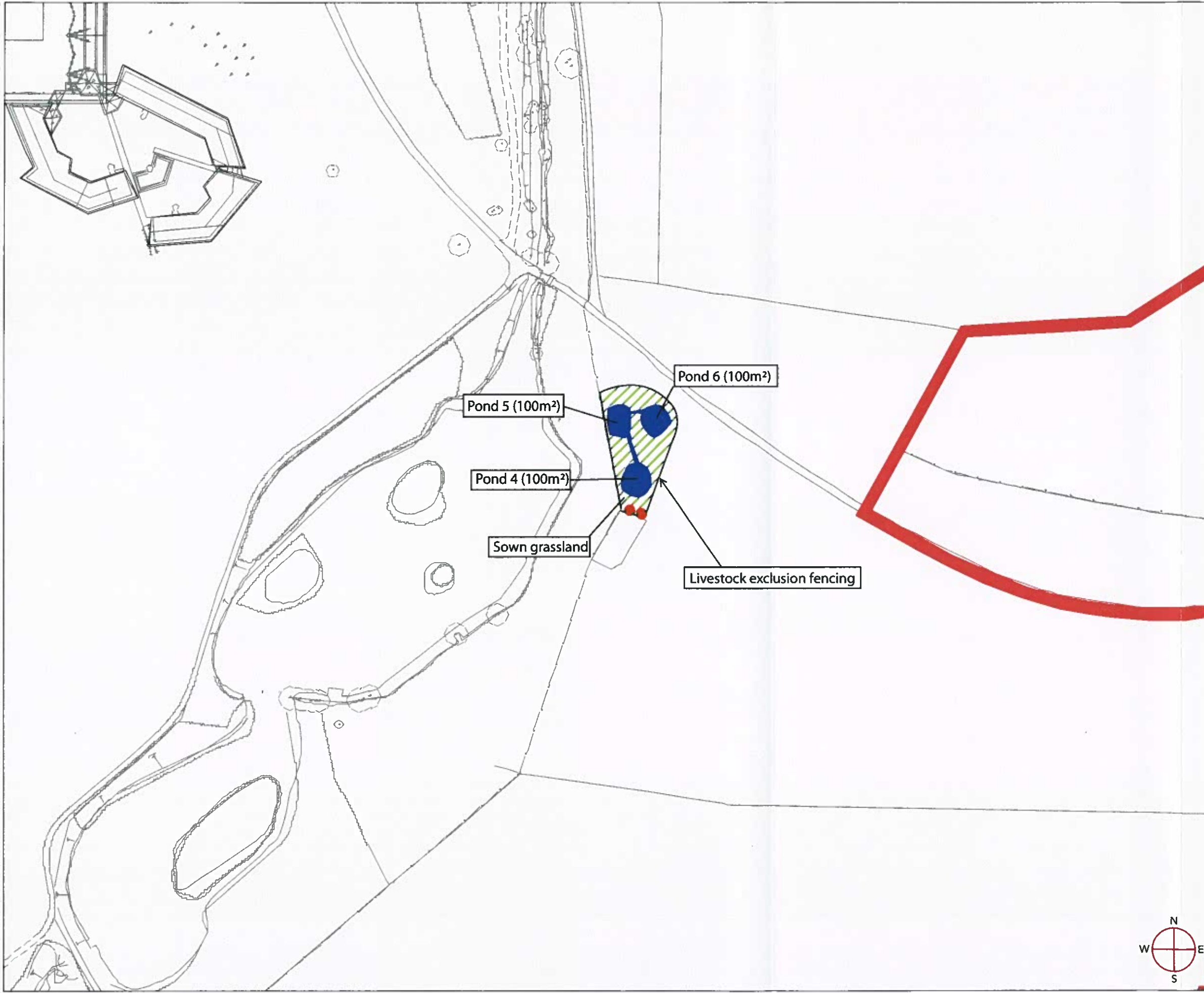
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Status	FINAL				

Dwg No.



Key

- Pond
- Grassland
- Hibernaculum



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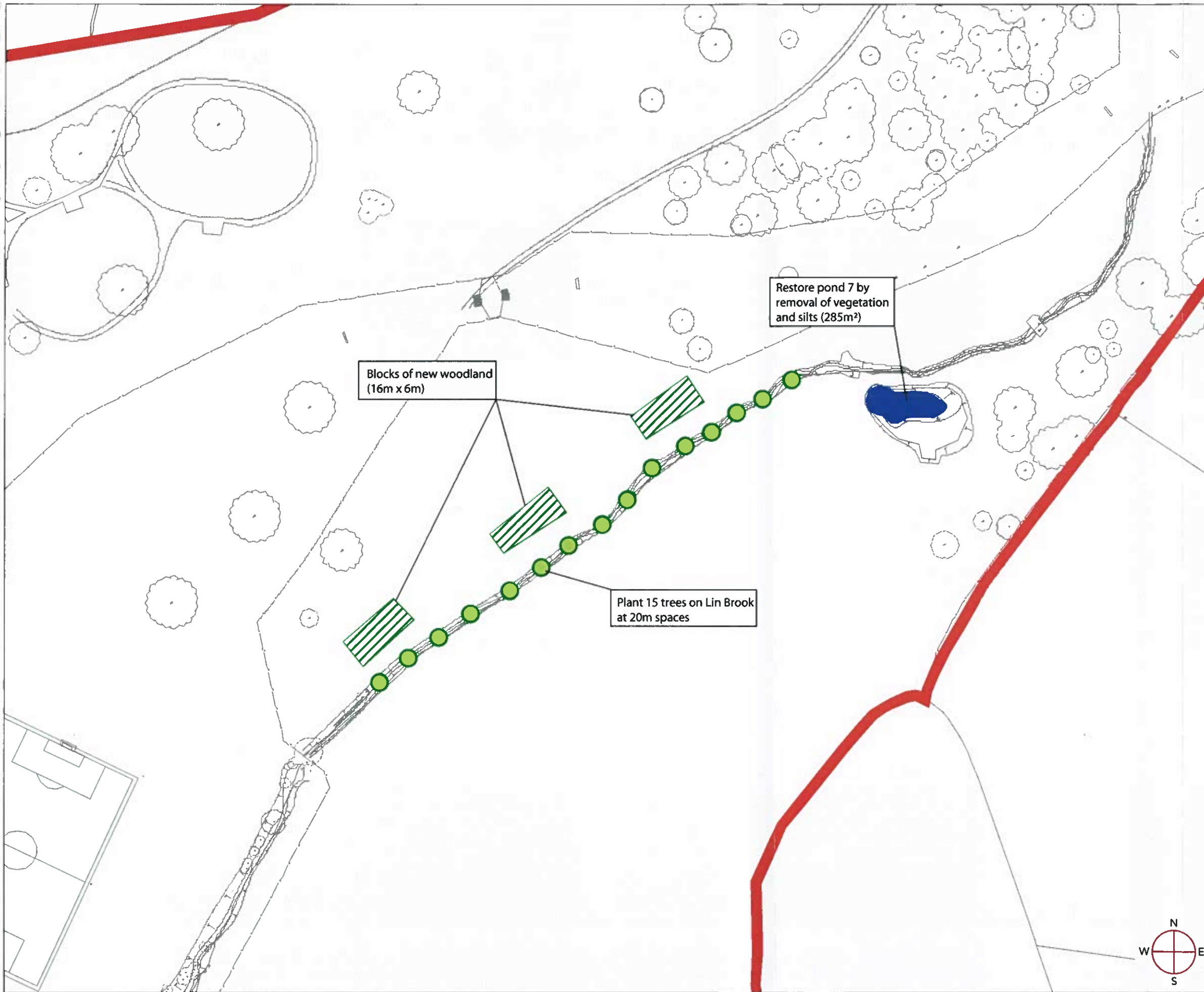
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Drawn	SM	Approved	KS	Job Ref	3376.07
Status	FINAL				

Dwg No.

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Pond 7 enhancement and habitat creation:
Northwest of receptor site 1



Key

-  Pond
-  Woodland
-  Trees

Blocks of new woodland
(16m x 6m)

Restore pond 7 by
removal of vegetation
and silts (285m²)

Plant 15 trees on Lin Brook
at 20m spaces

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Date	DEC'09	Checked	KS	Scale	NTS
Drawn	SM	Approved	KS	Job Ref	3776.07
Status	FINAL				

Dwg No.

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Appendix 2 Summary of Planning History



APPENDIX 2: BYRKLEY PARK - PLANNING HISTORY

LPA Ref.	Description of Development	Date Valldated	Decislion
OU/16573/001	Underground mining of gypsum and anhydrite	15/01/1987	Approved with conditions 21/09/1987
OU/16573/002	60-bedroom hotel, conference and sports centre, two 18-hole golf courses and conversion of the stable block to 25 dwellings.	21/09/1988	Committee resolution in November 1988 to approve subject to signing of Section 52 Agreement. Application withdrawn 21/06/1990
OU/16573/003	Two 18-hole golf courses, 150 bedroom hotel, leisure/conference facilities and 29 detached houses.	30/01/1991	Approved with conditions 30/01/1991
OU/16573/004	Change of use of land to two 18 hole golf courses, construction of 150 bedroom hotel, golf club, leisure and conference facilities and construction of 29 detached houses.	06/04/1992	Approved with conditions 16/07/1992
OU/16573/007	Renewal of planning permission 16573/04	10/07/1997	Approved with conditions 10/07/1997
OU/16573/008	Renewal of outline planning permission (OU/16573/007) for use of land as two 18-hole golf courses, construction of 150 bedroom hotel, leisure and conference facilities and construction of 29 detached houses.	02/02/2000	Withdrawn 31/10/2001
PA/16573/010/ PO	Development of the National Football Centre to include the erection of buildings to accommodate an indoor synthetic pitch and related activities, short term residential accommodation, media and office accommodation, associated facilities, the erection of three dwellings for staff accommodation, and the provision of outdoor pitches, car parks and the creation of a new access.	29/06/2001	Approved with conditions 13/08/2001
LB/16573/011	Listing Building Consent for repositioning of a mile post - verge to the south of the B5234 approximate 565m west of Five Lanes End Junction	26/10/2001	Approved with conditions 27/11/2001
PA/16573/016	Erection of temporary structure to house electrical equipment	21/03/2003	Approved with conditions 28/04/2003