



Small copper by Matt Berry



Cheshire

People taking action for wildlife

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FAO Rebecca Anderson

Planning Department,

Stockport Metropolitan Borough Council

27th March 2020

Dear Ms. Anderson,

RE: Planning application DC/074399 – Bredbury Gateway

The Cheshire Wildlife Trust would like to register an **objection** to the above proposals. The application site lies immediately adjacent to Botany Mill Wood Site of Biological Importance, an area of lowland mixed deciduous woodland likely to be priority habitat. Within the development site there are extensive lengths of native hedgerow and areas of semi-natural habitat. It is not known whether the site is important for priority/red listed bird species as these surveys have not been commissioned however BoCC red listed grasshopper warbler has been recorded at the site. Habitat for other birds, bats and badgers has been confirmed on the site.

The proposals show avoidance measures have **not** been implemented and losses of semi-natural habitat include approximately 2 km of internal native hedgerows, 6 ha of semi-improved or marshy grassland, 0.9 ha of scrub, 0.37 ha of woodland and two ponds. Habitat retention is limited to external boundaries.

We estimate that approximately 102 biodiversity units will be lost to the scheme with approximately 60 units created, leaving a shortfall (or net loss) of approximately 42 biodiversity units. We estimate that over 2km of native hedgerow will be lost to the scheme (around 350m of which is classed as important under the hedgerow regulations) with approximately 1850 m of predominantly ornamental hedgerow created.

The ES non-technical summary states that *“without adequate mitigation, the construction phase has the potential to adversely affect”* protected sites, badgers and habitat for foraging bats and nesting birds. Similar impacts are given for the operational phase, yet given the loss in biodiversity value at the site, even with measures in place to protect the surrounding habitat, it is clear that this scheme is highly damaging.

The Cheshire Wildlife Trust is particularly concerned that despite clear policy guidance there is:

- A net loss of biodiversity at this site of at least 40% but likely to be much greater
- No suitable mitigation for the loss of 2km native hedgerow including approximately 350m important hedgerow (according to hedgerow regulations)
- Despite the possible presence of red listed/priority grasshopper warbler there is little understanding of the importance of this site for birds because no bird survey was commissioned.

Working for wildlife across **Cheshire East, Cheshire West & Chester, Halton, Stockport, Tameside, Trafford, Warrington & Wirral.**

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- Runoff from the site will drain directly into the adjacent Site of Biological Importance with no apparent measures to clean polluted water.
- An inadequate buffer to protect the adjacent Site of Biological Importance (from disturbance pollution etc), which is less than 10m wide in places and has a footpath running through it.

The Planning Statement February 2020 inaccurately surmises (page 55 section 9.34) *“that the residual effects on all ecological receptors will be negligible”* and the ES non-technical summary states in section 1.21 that if *“adequate landscaping is implemented, the ecological value of the site will increase”*. **In the absence of specific avoidance, mitigation or compensation measures both these statements are totally unsubstantiated and unacceptable.**

We strongly recommend that the plans should be revisited with clear measures included to ensure that the natural environment is safeguarded in line with both local and national planning policies. If this is not possible then the impacts of the scheme should be offset in accordance with the mitigation hierarchy and the NPPF.

Once the plans are revised to specifically address the concerns listed above and/or offsetting is secured, it is essential that a CEMP and a long term habitat management/monitoring plan should be secured by planning condition.

National and Local Planning Policies

National and local planning policies clearly set out that protecting biodiversity through the use of the mitigation hierarchy is of paramount importance and this should be considered before determination. The following policies apply:

- Guidance set out in the new NPPF 2018 paragraph 175a states that *‘if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused’*.
- Protecting and enhancing biodiversity and safeguarding Local Sites (i.e. Site of Biological Importance) is set out in the NPPF 2018 paragraphs 170a, 171, 174.
- The protection and recovery of priority species and habitats is set out in NPPF 2018 paragraph 174b. i.e. To protect and enhance biodiversity and geodiversity, plans should:

174b. promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

- Protecting and safeguarding the natural environment including biodiversity, light and water pollution considerations are clearly set out in Stockport Core Strategy SPD Development Management Policy SIE-3.

‘Net loss of biodiversity and geodiversity will be prevented by applying a hierarchical approach to conserving and enhancing the network of nationally, regionally and locally designated sites and habitats;’

Yours sincerely,

Rachel Giles

Rachel Giles Ph.D.

Evidence and Planning Manager

Cheshire Wildlife Trust