



Small copper by Matt Berry



Cheshire

People taking action for wildlife

**Cheshire Wildlife Trust**

Bickley Hall Farm  
Bickley, Malpas  
Cheshire  
SY14 8EF

T: 01948 820728

E: [info@cheshirewt.org.uk](mailto:info@cheshirewt.org.uk)

W: [www.cheshirewildlifetrust.org.uk](http://www.cheshirewildlifetrust.org.uk)

FAO. Gareth Taylerson,  
Case Officer,  
Cheshire East Council.

2<sup>nd</sup> June 2020

Dear Gareth,

**RE: Planning application 20/1709N A500 DUALLING**

The Cheshire Wildlife Trust is the region's leading wildlife charity with over 13,000 local members whose views we seek to represent. In this capacity we would like to comment on application 20/1709N A500 dualling scheme Newcastle Road, Barthomley.

**1. Biodiversity Net Gain metric calculations**

CWT is extremely concerned that the biodiversity metric calculations are not transparent and may in fact be incorrect. The Biodiversity Net Gain good practice principles (2016) and the forthcoming British Standard (BSI 2020) state that transparency is absolutely key. Getting the baseline score correct is the most crucial part of the Biodiversity Net Gain metrics as it is used as a reference point against which any percentage gains are measured. An accurate baseline assessment is essential to ensure that appropriate levels/types of mitigation are provided and that impacts on both habitats and species can be addressed.

An accompanying section in the report should be provided which sets out which land parcels are affected and includes a justification for how distinctiveness and condition scores have been attributed.

**Baseline data**

As set out above, this is the most important section of the biodiversity metric calculation but we are aware of inconsistencies and possible errors including:

- Areas provided in the biodiversity metric calculator and the botanical report (B1832076/OD/40 June 2018) do not match, e.g. grassland parcel 13 is 0.03 ha in botanical report but 0.64 ha in metric calculator (0.04 + 0.60 ha).
- Plantation woodland is measured as 1.38 ha in botanical report but 3.98 ha in metric calculator. There is also missing supporting botanical information.
- Scrub habitat is measured as 0.26 ha in the botanical report but 0.46 ha in metric calculator. There is also missing supporting botanical information.

All parcels must correspond with the survey information so habitat distinctiveness and condition scores can be checked.

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

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Furthermore there appears to be vital labelling information missing from both the metric calculator and the ES report:

- A confirmation of which grassland parcel corresponds to the potential Local Wildlife Site (pLWS) at Monnerley Meadows so that the botanical survey information can be checked.
- It is not clear if temporary use areas are included in the metric calculations (they need to be).
- Missing botanical and condition assessment justification for fourteen habitat parcels listed in the baseline metric data. Were any of these surveys undertaken in winter? If so condition scores should be precautionary.

#### **Target condition/distinctiveness scores**

- The correct habitat creation codes in the master plan should be attributed to the proposed habitat creation/restoration parcels in the metric calculator.
- There is an over estimation in the target condition for areas of the amenity grassland immediately adjacent to the route (medium distinctiveness, moderate condition). The proximity of this grassland to the carriage way means it will be exposed to the effects of pollutants including, but not limited to, nitrogen oxides (Nox), particulates and salt spray. This issue is highlighted in section 1.10.2 of the ES. It is highly unlikely this habitat will achieve anything better than poor condition. This will need amending in the metric calculator (i.e. split out from open grassland LE 1.6 in calculations).
- The predicted annual deposition of nitrogen on sensitive habitats in the vicinity of the scheme is expected to exceed the annual critical load by approximately 2-5 times (for neutral grassland and broad-leaved mixed and yew woodland respectively - ES 2020 section 1.7.8). We are therefore pleased that this has been reflected in the extended time periods to achieve target condition for some of the new grassland habitats, although we advise that none of these habitats are likely to achieve good condition and therefore the metrics should be amended accordingly to show a target condition of no higher than moderate.
- New gravel access routes have been entered into the metric as low distinctiveness habitats and not hardstanding. This requires justification.

#### **Resourcing and Monitoring/management plan**

- It is vital that a land management programme is set out in a Management and Monitoring Plan (MMP) so that it corresponds to the time required to achieve target condition (a minimum of 20 years for some habitats to achieve condition). If this is not secured it is highly unlikely the required gains will be achieved. Habitat management and monitoring will need resourcing.

## **2. ES - Inaccurate assessments of importance (ES table 1.6 Ecological Impact Assessment summary)**

### *Wintering and breeding birds*

We are very disappointed that despite a firm written commitment from Jacobs in relation to our earlier comments (3<sup>rd</sup> October 2018), the importance for wintering and breeding birds has not been revised upwards to 'county level' in the 2020 ES. This requires amending as agreed.

### *Species-rich grassland (neutral/acid)*

We remind Jacobs that all parcels of grassland that meet the Cheshire Local Wildlife Site (LWS) criteria are considered to be of county importance. The botany report lists parcels 6, 7, 8, 12, 13 as meeting the LWS criteria and our own observation indicates parcel 11 also meets the criteria. According to the Biodiversity Metric calculator parcels 12 and 13 are directly impacted by the scheme, both these parcels are of county importance. This must be acknowledged in the ES.

### *Invertebrates*

The invertebrate population is considered to be of county importance (meeting LWS criteria) but this has been incorrectly assessed as being of local importance. This should be revised in the ES.

### *Water vole*

The water vole population in this area is thought to be one of 4 remaining meta-populations in Cheshire this been undervalued in the ES despite Jacobs being made aware of the recent population assessment (Meredith *et al* 2013 and more recently by Powell 2018). Water voles are the fastest declining mammal in the UK and populations in Cheshire are thought to be in danger of extinction. The importance of this population should be increased to county level.

## **3. Residual impacts (ES table 1.6 Ecological Impact Assessment summary)**

### *Water vole*

We are particularly concerned that the proposed water vole habitat improvements may not be sufficient to mitigate for the permanent impacts when connectivity on their water courses are permanently severed. The plans show 0.35 ha of mitigation habitat and improvements on 0.43ha of existing habitat. A detailed water vole mitigation plan should be submitted to demonstrate how these habitats will be managed and how the impacts will be monitored in the long term.

### *Wintering and breeding birds*

There are no specific habitat creation measures aimed at mitigating impacts on the wintering and breeding birds of county importance present in the locality, in particular yellow wagtail, lapwing and skylark.

### *Acid grassland priority habitat*

No acid grassland habitat creation has been put forward despite losses of this priority habitat.

### *Invertebrates*

There are no specific measures to mitigate for impacts on the invertebrates of county importance in the locality (for example planting food plants for dingy skipper, ringlet, small heath and white letter hair streak).

### *Veteran tree*

The impact on the veteran tree is permanent (irreplaceable habitat) and will not disappear after 15 years as incorrectly stated in the ES.

*English elm*

A detailed plan of the retention/protection of this tree *in situ* is required. The plan must ensure that the tree is fenced at all times with metal fencing to beyond the extent of its canopy.

#### **4. Summary of residual impacts**

As set out above some of the residual impacts listed in the ES 2020 are incorrect. In summary, implementation of the current plans will mean that the residual impacts after 15 years are highly likely to remain significant for:

- Acid grassland
- Veteran tree
- Breeding birds
- Wintering birds
- Invertebrates
- Water voles (unless long term management and monitoring is secured)

Apart from the veteran tree all the above will require targeted measures to address.

#### **5. Conclusion**

**CWT strongly advises that the biodiversity metric calculations are revised so that an accurate assessment of the likely residual impacts to both habitats and species may be undertaken. In particular the inaccuracies in the baseline metric calculations must be addressed.**

**Specific measures to address impacts on acid grassland, invertebrates and habitat for lapwing, skylark and yellow wagtail should be put forward to support the application. The impacts on lapwing, skylark and yellow wagtail could be addressed by offsite habitat creation. A detailed water vole monitoring and management plan must be produced.**

I trust you will find these comments helpful.

Yours sincerely,

*Rachel Giles*

Rachel Giles Ph.D.

**Evidence and Planning Manager**

**Cheshire Wildlife Trust**

[rgiles@cheshirewt.org.uk](mailto:rgiles@cheshirewt.org.uk)