



Small copper by Matt Berry



Cheshire

People taking action for wildlife

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Dear Nick,

1st December 2015

RE: 14/0282M Land off Congleton Road, Macclesfield, Cheshire

Thank you for consulting with the Cheshire Wildlife Trust regarding further information which has been submitted in relation to application 14/0282M (Land off Congleton Road, Macclesfield, Cheshire). We would like to make a number of comments in relation to this information:

Evaluation

We are pleased that a voluntary ES has been submitted and concur with the majority of the conclusions reached within the EclA section of this document. Table 9.9 and section 9.322 of the EclA concluded that without adequate mitigation it is certain that there will be permanent significant impacts at a county and district level on a number of ecological receptors including:

Lowland raised bog, Wet woodland, Marshy grassland (i.e. unimproved grassland present on the adjacent SMDA), Lowland deciduous woodland, Good quality semi-improved grassland, and Coastal and floodplain grazing marsh.

All of these are S41 priority habitats and we are of the opinion that the first three should be valued higher than 'county' importance i.e. at a 'regional' level as they are listed as 'Key nature conservation habitats' in the Meres and Mosses Natural area (Area 27)

Reptiles on the SMDA should be valued at a county level (meeting the criteria for LWS selection). The whole site hosts suitable habitat with connectivity to Danes Moss SSSI where reptiles are listed on the reason for notification. The onsite population should be considered part of a larger metapopulation with an extensive range which is unique for lowland Cheshire.

Birds were evaluated as being of importance at the Local level and invertebrates at the Local/County level. These evaluations are largely based on incidental records and are therefore not reliable. For these receptors to be adequately considered within the ES additional survey work will be required. Wintering bird vantage point surveys should be undertaken in line with Scottish Natural Heritage guidance and breeding bird surveys should be undertaken in line with best practice guidance. We strongly suggest that this is carried out as part of the ES for the wider SMDA. This is likely to take at least one year to complete. Terrestrial/aquatic invertebrate surveys could be completed within one survey season.

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

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Significant ecological impacts

In order to conclude that the impacts of the proposed development will be reduced to non-significant levels once the recommended mitigation measures are successfully implemented (para 9.343 EclA) it will be necessary to provide details of the agreed mitigation/compensation measures. The evaluation should also consider the cumulative and 'in combination' impacts of developments in the wider area including increased levels of disturbance on retained habitats.

No conclusion regarding significant residual impacts can be made without an agreed mitigation/compensation strategy for all impacted ecological receptors.

Recommendations

Although the residual impacts of this development have not yet been adequately assessed we advise that due to the scale of the likely losses associated with application 14/0282M a substantial area of land will be required to mitigate/compensate. The most appropriate area is a triangle of land located in the far south east of the SMDA. This triangle incorporates land which lies to the south of the proposed East-West access road (identified as 'potential mixed non-residential development' on the Illustrative Master Plan Option 2 – 2013).

The majority of this area is priority S41 habitat (WYG area 7 – unimproved marshy grassland) and important on a regional scale as it is an identified feature of the Meres and Mosses Natural Area. A small section of it was identified as a potential receptor area for reptiles by WYG. Restoration of this triangle of land would ensure that connectivity of the mitigation/compensation area to Danes Moss SSSI is maintained and possibly enhanced. Habitat improvements here would also benefit species other than reptiles whilst ensuring that the viability of metapopulation of reptiles is not compromised by the development. Connectivity between this area and the retained habitats on the wider SMDA should be maintained. Suitable measures could be in the form of road underpasses designed for mammals/reptiles/amphibians.

We would also like to highlight that due to the scale and cumulative losses of priority S41 habitat (and habitat for priority S41 species) expected to occur when the wider SMDA is developed, it is highly likely that further offsite compensation will be required to ensure 'no net loss' of biodiversity.

Conclusion

We look forward to seeing details of the mitigation/compensation measures and once these are available we will be able to assess the likely residual impacts and respond accordingly. In the meantime our objection to this development still stands on the grounds that no clear mitigation/compensation proposals have been submitted for the significant impacts (including cumulative impacts) likely to occur as a result of this development.

Determination of this planning application without due consideration of the ecological impacts would contravene local and national planning guidance, specifically:

1. Policy SE3 of the forthcoming Local Core Strategy which states that 'all development must aim to positively contribute to the conservation and enhancement of biodiversity and geodiversity and should not negatively impact biodiversity or geodiversity'.
2. The NPPF paragraph 109, which states that the planning system should contribute to and enhance the natural and local environment by 'protecting and enhancing valued landscapes' and 'minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'

Yours sincerely,

Rachel Giles

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Cheshire Wildlife Trust