

"Helping deliver sustainable farming"



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21/00517/F Wroxtton MX track.

Response to Charlotte Watkins E-mail dated 28/06/2021

Landscape Plan

Is the new enhancement scheme to replace the Landscaping scheme of Jan 2021?

- **The Ecological enhancement scheme June 2021 supersedes the original Landscape that you refer to.**

The Ecological Enhancement Scheme June 2021:

The additional hedgerow proposed to be planted is acceptable in terms of species. There is nothing on ongoing management in terms of frequency of cutting and height.

- **Hedges would be allowed to grow up to a height of at least 2m and be trimmed every other year during January/February to allow the winter berry crop to be available to birds and other wildlife.**

In order to ensure there is a chance of the hedgerow being a successful habitat and in particular the proposed floristically rich margins there will need to be installation of some sort of (wildlife permeable) fence or knee rail to ensure there is no walking or driving/parking close to the hedge or within the margin proposed.

- **I agree that a barrier such as a knee rail would be beneficial in preventing damage to the hedgerow margin**

3- 4m wide (and it doesn't say which – it should because an extra metre along this length of hedgerow would dramatically change the net gain achieved) is too narrow to ensure the hedgerow is fit for use by wildlife. With vehicles parked as close as this or potentially earthworks and large machinery this close the hedgerow roots would be impacted. A buffer of 10m to the hedgerow should be maintained where possible. The tree officer could advise further on this also.

- **Obviously the wider the margin, the more beneficial it will be for wildlife, but a 4m wide margin will still be able to support a range of typical flora and fauna associated with the**

hedge bottom and I disagree that it would not be fit for use by wildlife. A tree root protection zone of 10m would seem to be excessive for a hedgerow given the likely diameter of the stems of the shrub species.

We need a copy of the actual Biodiversity Impact metric to be sent over as I cannot tell what condition they are aiming for in their newly created habitats and the time scale until achievement. It is difficult to assess whether this net gain is realistic without it.

- **A Biodiversity Impact Metric Spread sheet is attached and has been updated to include acid grassland as habitat enhancement**

The landscape scheme mentions light grazing by sheep will occur. Is this also in the margins? How does this fit in with their management? Or will these be fenced off?

- **Some autumn grazing of the hedgerow margins would be beneficial to prevent the vegetation becoming too rank at the expense of its floristic element. The hedgerow itself will need to be fenced to prevent sheep browsing the planted shrubs.**

It is unclear from the metric data supplied whether they count the areas to be camped on with camper vans and parking for vehicles/trailers as G4 modified grassland or whether these areas are counted as lost (which they probably should given the weight of traffic to be regularly on it?)

- **The camping area is counted as G4 modified grassland. Since this habitat will not be destroyed, it has not been counted as lost.**

At least one of the areas proposed for small scale woodland creation appears to be on a very steep slope surrounded by track and skid marks. I am not convinced that this would be very successful for trees to survive or reach their natural size in terms of root protection zones? Again I would advise checking with the tree officer or landscape officer as to the likely success of this choice of site but I doubt anything beyond poor condition could be achieved.

- **Shrub species would form the margin of the woodland to create a more graded edge with larger trees within the middle of the plantation, planted further away from the track.**

Great Crested Newt Mitigation Scheme

It seems that Great Crested Newts are using one of the ponds which is surrounded by track on all sides. A population survey has not been carried out so we do not know what population size is present or whether it forms part of a meta-population with other ponds in the area (although these came back negative). The mitigation plan shows significant grassland around the TN6 pond however other aerial photos I have been sent suggest the track comes right up to the edge of the pond (see below). I think there would need to be some sort of rail or delineation to ensure that vehicles/bikes do not stray this close to the pond.

- **There is ephemeral/ ruderal vegetation on the bank along the southern side of the pond. The track does indeed pass quite close to the northern side of the pond and it would be beneficial to have a barrier alongside which would not only help prevent riders going too close to the margin, but also prevent sediment flung up by the bikes entering the water.**

The mitigation gives a significant number of steps which will be required in order to ensure no offence occurs. These may need to be written in a clearer format to ensure there are no issues with

other aspects of their scheme. For example I understood these ponds to be part of a scheme to trap silt? Will it be possible for them to only do any works on them in November?

- **It should be possible to carry out the necessary silt removal works only in November**

Run off into the pond known to contain GCN will also need to be prevented. I'm just trying to check that it all adds up across the site. Mitigatory works would need to be in place before anything else happens on site. Note that all use of the track and movement within habitat likely to be used by Newts needs to cease before dusk. All activity on site should anyway cease on site before dusk because of the detrimental impacts on roosting birds and bats. Strict time limits on activity, noise and lighting will limit some of the impacts on wildlife to some degree. Whilst I can see the mitigation scheme has devised a number of good suggestions in terms of working with what they have I feel the chance of GCN being harmed at the individual level is fairly high with bikes racing within metres of the pond on a much more regular basis than to date.

- **I disagree that there is high chance of harming GCN during races which will take place during the day. GCN are much more likely to move overland during the night.**

I would suggest that they consider obtaining a licence to effectively 'destroy' the ponds capability to support newts and accept the greater mitigation that needs to go with this. I cannot see that a favourable conservation status for the population in the pond can be maintained long term with the number of race days and camping proposed or with regular run off into the pond from the spraying of the track and exposed earth. I would recommend gaining an updated response from Nature Space or Natural England on this.

- **We have been in contact with Nature Space, but unfortunately they are unable to offer assistance due to the retrospective nature of this planning application.**

Otherwise I feel there is a danger of either regular offences or racing needing to be stopped regularly whenever a GCN is sighted (and that's if their presence is noticed which seems unlikely). I am uncomfortable with the 'reasonable avoidance measures' path in this case now that we know GCN are actually on site within the track circuit. If this system is used then regular reviews by a licensed ecologist will be needed to ensure that the created habitats function and that all avoidance measures are being carried out as written.

- **I feel that adherence to 'reasonable avoidance measures' is achievable with the guidance of a licenced ecologist rather than destroying the ponds on site.**