

Gloucestershire Wildlife Trust Correspondence 07/08/2020

ENCLOSURE 2

Correspondence from Gloucestershire Wildlife Trust, dated 7th August 2020



Gloucestershire Wildlife Trust
Robinswood Hill Country Park
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By email to:
Emma Pickernell, Cheltenham BC

Gary Kennison, Gloucestershire CC

Alistair Baxter, Aspect Ecology

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Registered charity number: 232580

Registered in England number: 708575

07 Aug 2020

Proposed Local Wildlife Site at St Edwards Prep School, Charlton Kings (Site under planning application 20/00683/OUT)

Dear Sir/Madam

Regarding the proposal for Local Wildlife Site status on land at St Edwards Prep School, Charlton Kings (Site under planning application 20/00683/OUT).

In order to achieve the goal of a balanced and useful Local Sites system, the Gloucestershire Wildlife Sites Partnership uses minimum habitat and species thresholds that fit the unique biodiversity of the county into a wider context, and a set of general criteria based on the DEFRA-recommended version of the Ratcliffe criteria.

The proposed site does meet the criteria set out in the Key Wildlife Sites (now referred to as Local Wildlife Sites [LWS]) handbook (2015), being greater than 0.5 ha (site is approximately 3.5 ha), confirmed as MG1 grassland habitat by NVC survey carried out by Aspect Ecology in July 2019 and Aug 2020 and by Bioscan in July 2019 and recording, through combination of all of the above surveys 22 species from the grassland list. However, MG1 can cover a wide range of grassland condition, from very high grass cover and few herbs through to much lower grass density and significant herb cover. As it stands at the moment, the proposed site is of borderline LWS quality and the LWS process requires it to be examined by the LWS selection panel to determine whether it should be adopted as a LWS or not. The panel may be unable to convene before the planning application goes to committee.





The site lies within a gap in grassland ecological network connectivity. Enhancement to grassland habitat within this area would benefit the ecological network and with appropriate management the quality of the grassland on this site could be enhanced within a relatively short time. Irrespective of the LWS selection panel decision, it is Gloucestershire Wildlife Trusts view that any development on this site should provide a strong commitment to biodiversity net gain and a strong management and maintenance plan for both the grassland and veteran tree features on the site.

Kind regards

A handwritten signature in black ink, appearing to read 'J Hynes'.

Dr Juliet Hynes

Gloucestershire Nature Recovery Network Coordinator



Gloucestershire Wildlife Trust Correspondence 01/09/2020

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1st Sept 2020

20/00683/OUT | Outline application for 43 dwellings including access, layout and scale, with all other matters reserved for future consideration | Land Adjacent To Oakhurst Rise Cheltenham Gloucestershire

Dear Sir/Madam,

I am writing to provide Gloucestershire Wildlife Trust's (GWT) comments regarding the biodiversity mitigation proposed in application 20/00683/OUT.

The grassland on site has been assessed in the applicant's ecological report as of poor quality semi natural grassland. However, there are as they mention, a number of indicators of unimproved neutral grassland, a resource for which we only have 1677ha recorded in the county (0.6% of the county by area). Though these indicators are in some cases infrequent in the sward, they and the historic of lack of agricultural improvement of the site, do suggest that if the site were to be more appropriately managed, e.g. appropriately timed annual hay cut and removal of the arisings, the site would be likely to develop to a more unimproved grassland quality.

The ecological report enhancement measure EE2 talks of grassland creation, however, in the response to Friends of Charlton Kings (20_00683_OUT-ECOLOGY_BRIEFING_NOTE_ON_BEHALF_OF_THE_APPLICANT-1076642.pdf) the consultant clarifies that existing grassland will be retained and enhanced. GWT would endorse the retention of the grassland intact and enhancement of the sward through local provenance seed. The ladies bedstraw is not widespread across the site, being mainly in a couple of large patches to the north west of the ice house. Attempt should be made to preserve this in situ.





The largest area of retained grassland, being retained for school use, will not have public access. This gives greater confidence that under enhancement and correct management a more species rich sward should develop. It should be made clear to residents that this area has no public access and fencing should be such to ensure it is not easy to gain access. Management should consider the requirements of both the enhancement of plant species diversity but also the maintenance of invertebrate species recorded on the site such as chimney-sweeper moth and five spot burnet moth.

The site has been confirmed to pass the Local wildlife Site (LWS) selection criteria by the Gloucestershire LWS selection panel (01/09/2020) on the grounds of Value for Learning, being a good selection of habitats and species exceptionally well-placed to offer educational opportunities by its proximity to a school. The mitigation plan will enable the continuation of part of the site to meet the same criteria, however, GWT would like to see conditions in place such as a conservation covenant to ensure the undeveloped area of the site is secured for biodiversity in perpetuity.

For areas accessible to residents the outcome of grassland enhancement is of lower confidence as access by dog walkers is likely to result in nutrient enrichment and compaction.

GWT's view that the mitigation and enhancements for the habitats and species recorded on site are adequate to achieve no net loss of biodiversity.

Kind regards

A handwritten signature in black ink, likely belonging to Dr Juliet Hynes.

Dr Juliet Hynes

Nature Recovery Network Coordinator



Gloucestershire Wildlife Trust Correspondence 02/09/2020

Gina Parle

Subject: FW: LWS selection panel outcome 20/00683/OUT
Attachments: St Edwards Prep School 20_00683_OUT GWT mitigation response.pdf

From: Juliet Hynes [<mailto:juliet.hynes@gloucestershirewildlifetrust.co.uk>]
Sent: 02 September 2020 10:13
To: Emma Pickernell
Subject: LWS selection panel outcome 20/00683/OUT

Dear Emma,

The Local Wildlife Site (LWS) Selection Panel met on 01/09/2020 to consider the proposal for St Edwards Prep School Meadow to be a LWS.

In addition to me providing secretariat, the LWS Selection Panel consists of a representative from each of the following:

Gloucestershire Naturalists' Society
Gloucestershire Wildlife Trust
A Gloucestershire Local Planning Authority

The Panel agreed that the site passes the Gloucestershire Local Wildlife Site Selection Criteria 2015 under point 9. Value for learning – “*c. the site is exceptionally well-placed to offer educational opportunities either by its proximity to a school or other place of learning, or its easy accessibility for study of the species and habitats present without causing unacceptable damage or disturbance*”. The site is part of the land currently leased to the St Edwards Prep School and therefore by its proximity to the school and range of habitats and species on the site, it is exceptionally well placed to provide accessibility for study. Whether the school currently uses the site for nature study or not, is not a decision point as the LWS criteria aim to protect sites to maintain benefit into the future and changes in curriculum or personnel could easily result in change of attitude towards use of the site. LWS may be selected purely on the grounds of excellence for the understanding of biodiversity, even where other criteria are not met.

The Panel also consider that the site may also pass the criteria for MG1 grassland plant species. Two sets of plant species data that were provided for the site by Aspect Ecology (applicants representative) and Bioscan (Friends of Charlton Kings representative) differ but between them provide a match for 22 species from table H5c of the LWS criteria. Under normal circumstances we would conduct our own independent survey at the correct time of year to decide whether the grassland passes the criteria based on plant species. However due to the timescale associated with the planning application this is not possible.

The site will be recorded on the LWS database as St Edwards Prep School Meadow.

Kind regards
Juliet

Dr Juliet Hynes
Nature Recovery Network Coordinator
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Gloucestershire Wildlife Trust Correspondence 07/09/2020

Alistair Baxter

From: Juliet Hynes <juliet.hynes@gloucestershirewildlifetrust.co.uk>
Sent: 07 September 2020 16:25
To: Alistair Baxter
Subject: RE: Oakhurst rise/St Edwards Prep School field

Dear Alistair, Thank you for the revised version of the Framework Management Plan (FMP) and the acknowledgment that these comments refer to the FMP only. Gloucestershire Wildlife Trust confirms that the prescriptions within the revised draft of the FMP should result in securing and enhancing the biodiversity interest of the retained areas of the Local Wildlife site.

Kind regards
Juliet

Dr Juliet Hynes
Nature Recovery Network Coordinator
Gloucestershire Wildlife Trust
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From: Alistair Baxter <alistair.baxter@aspect-ecology.com>
Sent: 07 September 2020 16:01
To: Juliet Hynes <juliet.hynes@gloucestershirewildlifetrust.co.uk>
Subject: RE: Oakhurst rise/St Edwards Prep School field

Dear Juliet,

Thank you for your response of today's date in regard to the draft Framework Management Plan (FMP). We have taken on board all of the Trust's points and incorporated these into an updated FMP. I would be grateful for confirmation that as a result GWT can now endorse the FMP and its conclusion that *"these prescriptions will provide a varied resource for wildlife that secure and enhance the interest of the Local Wildlife Site"*. We understand that this would not be taken as an endorsement of the planning application itself by GWT.

Regards

Alistair Baxter
Director
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