

KWS Assessment

Project: Land Adjacent to Oakhurst Rise, Cheltenham

Technical Briefing Note TN08: Assessment of the Site Against Gloucestershire Local Wildlife Site Criteria

Date: 07 August 2020

1. Executive Summary

- 1.1 Aspect Ecology has carried out a review of the above site in relation to the Gloucestershire Key Wildlife Site (KWS) Selection Criteria, which have been developed by the Gloucestershire Wildlife Sites Partnership.
- 1.2 In order to potentially qualify as a KWS on the basis of grassland habitat, a site must meet at least one of nine General Criteria, such as diversity or value for learning. In addition, any site must be subject to detailed botanical survey work to identify the plant communities present (using the National Vegetation Classification NVC methodology) and identify the presence of any species listed as occurring on grasslands of high conservation concern in Gloucestershire. The site must fit one of the listed plant communities AND have above a threshold of the listed species of conservation concern in order to potentially qualify as a KWS.
- 1.3 A review of the site against the General Criteria has been carried out below, which finds that the site does not meet any of the listed criteria. This is largely due to the small size and suburban nature of the site (being surrounded on three sides by housing and on the fourth side by a school), a lack of historic management, a lack of public access and a lack of species diversity.
- 1.4 The site has been subject to detailed botanical survey work by an experienced botanist in August 2020, which finds the site is considered to have the closest affinity to NVC community MG1a, which is a grass-dominant, species-poor community typical of fields subject to infrequent management. Correspondingly, the site therefore must contain at least 20 of the listed species of conservation concern. The survey identified 12 species which therefore falls well short of the threshold of 20.
- 1.5 In summary, detailed botanical survey work coupled with a review of the General Criteria finds that that site is not of elevated value. Accordingly, in our opinion it does not meet the required criteria for designation as a KWS. Indeed, should it be designated it would serve to de-value the series as a whole through the inclusion of a non-key site.

2. Introduction

- 2.1 It is understood that the land adjacent to Oakhurst Rise, Cheltenham has been put forward by Charlton Kings Friends (CKF) as a potential Gloucestershire Key Wildlife Site (KWS), on the basis of its grassland habitat. This is set out in correspondence from Bioscan dated 29 July 2020.
- 2.2 Aspect Ecology has been commissioned to carry out a review of the potential of the site to qualify as a KWS. This review is set out below.

3. Process of Designation

- 3.1 The methodology for selection of KWS is set out in Part 1 of the Gloucestershire Key Wildlife Sites Handbook¹, and is summarised below.

Gloucestershire Wildlife Sites Partnership

- 3.2 During 1976-1977, the Gloucestershire Wildlife Trust conducted a habitat survey of the county. As part of this work, approximately 300 sites were surveyed which were identified as being of ecological significance within Gloucestershire and formed the first Key Wildlife Sites. The Gloucestershire Wildlife Sites Partnership was set up in January 2010 to oversee the Key Wildlife Sites system.

Site Selection Panel

- 3.3 From within the Wildlife Sites Partnership, the handbook stated in 2015 that a panel would be appointed to apply the LWS selection criteria and decide whether a candidate site should be designated as an LWS. As stated in section 1.10 of the handbook: *“The operation of the Site Selection Panel is heavily dependent on the carrying out of regular KWS surveys, both of potential new sites and existing KWS.”*

Site Survey

- 3.4 Section 1.11 of the handbook gives guidance in relation to surveys, such as acquiring landowner permission to access the site for survey. In this regard it states: *“If no permission is forthcoming, either through inability to contact the landowner or through refusal, then surveyors will not trespass on land in order to acquire data”.*
- 3.5 A key element in identifying a KWS is the carrying out of a detailed and robust site survey. No specific guidance is given in the handbook in relation to the requirements for experience and expertise of the surveyors, however in relation to habitats it states *“Habitat survey for KWSs is based upon an extensive survey with site and habitat descriptions, a habitat map and species list... Full National Vegetation Classification survey information may also be collected and used on occasions.”* Given the key importance of obtaining accurate high quality survey data in informing the KWS site selection process, survey data should therefore be collected by reputable surveyors or organisations.
- 3.6 The criteria for a grassland KWS (as described further below) state that sites may only qualify where the grassland is identified as a particular plant community type using the National Vegetation Classification (NVC) system AND supports a threshold number of particular species from a given list. Carrying out NVC surveys requires a high level of knowledge and expertise, and

¹ GCER (July 2015) Gloucestershire Key Wildlife Sites Handbook Part 1 v4.5 Final

therefore it would be expected that a suitably robust survey would be carried out by environmental professionals with many years' experience of carrying out botanical surveys and using the NVC technique. Therefore, whilst surveys carried out by amateurs may be helpful in highlighting the potential of a site to be a KWS, should not be relied upon as an evidence base for site selection and therefore caution should be attached to any such records.

3.7 On completion of the survey, a report is written by the surveyor and sent to the Site Selection Panel to evaluate each site against the selection criteria, who will call in additional technical expertise where required. If the site meets the thresholds within the selection criteria it is put forward for selection as a proposed KWS.

3.8 Any site which is not approved would be recorded for a review at a later date, for example borderline KWS or sites with inadequate survey information (i.e. survey data has not been collected by a suitably experienced surveyor or reputable organisation).

Ratification and Notification of Landowners

3.9 Following the above, the potential KWS goes through a formal ratification process and the site is added to the KWS register.

4. Site Selection Criteria

General Criteria

4.1 Part 2 of the Gloucestershire Key Wildlife Sites Handbook lays out the site selection criteria for KWS². As set out in section 2.5 of the document, all sites should fulfil at least one of the criteria in the Checklist of General Key Wildlife Site Criteria (set out in section 2.1 of the handbook part 2) which include:

- Size or Extent;
- Diversity;
- Naturalness and Typicalness;
- Rare or Exceptional Feature;
- Fragility;
- Recorded History or Cultural Associations;
- Wildlife Corridors and Other Connected Habitats;
- Value for Appreciation of Nature; and
- Value for Learning.

4.2 Section 2.5 states that some habitat selection thresholds depend on lists of indicator plant species, however it is important to note that the Site Selection Panel will **NOT** select a just because it fulfils the minimum threshold of species, the site must also fulfil **at least one** of the General Criteria. It also states that: "*Sites which only support habitats with features that do not meet the minimum thresholds will not be selected as KWS, unless other factors – such as value for learning or nature appreciation – are particularly well represented*".

Grassland Habitat Criteria

4.3 Within the grassland section of the handbook (section H5 starting on page 25), there are three sub-categories:

² GCER (July 2015) Gloucestershire Key Wildlife Sites Handbook Part 2 v4.5 Final

- **H5.1.** This includes all grasslands larger than 0.5 ha which are identified as one or more of the NVC types in Table H5a (which includes community types CG3, CG4, CG5, U4, U5, MG4 and MG5) **AND** which support **15** or more species from Table H5c (which comprises a list of species occurring on grasslands of high conservation concern in Gloucestershire). **These are high priority grassland types.**
- **H5.2.** This includes areas of semi-natural grassland larger than 0.5 ha which are identified as one or more of the NVC types in Table H5b (which includes community types CG7, CG10, U1, MG1, MG6, MG9, MG10, MG11, MG12 and MG13) **AND** which support **20** or more species from Table H5c.
- **H5.3** – All semi-natural grasslands below 0.5ha which fit the description for H5.1 or H5.2 where they occur in connection with other qualifying habitats, either as a mosaic or as an adjacent patch.

4.4 Table H5c sets out a list of species occurring on grassland of high conservation concern in Gloucestershire, however no indication is given in relation to the abundance at which these species might occur in the sward. It therefore takes the simplistic view that if the species is present in the sward, that it counts towards the threshold number, even if only a single specimen is present. Therefore, a grassland with extremely low frequency of the listed species may still meet the threshold, despite it being of poor quality in all other respects (e.g. being dominated by common coarse grass species with very low coverage of herbs). This constraint is overcome to a certain extent by the grassland needing to meet the threshold number of species **AND** fit with one of the listed NVC plan communities **AND** at least one of the General Criteria, but again fitting to these NVC communities does not imply that the grassland sward is species-rich, or of high ecological value.

5. Review of the Site Against the Selection Criteria

5.1 A review of the site against the LWS selection criteria has been carried out below in relation to the grassland habitat criteria and the general criteria.

Grassland Criteria

5.2 In order to determine whether the site meets the thresholds for a KWS under the grassland habitat criteria, an NVC survey was carried out of the site in August 2020. The survey was carried out by an experienced botanist with over 12 years' experience in carrying out botanical and NVC surveys (the surveyors CV is provided with the full survey report in Annex 5487/1). In addition to the NVC survey, a transect was walked across the entire site to identify and record a representative list of field-layer vascular plant species within the site, along with any of the species listed in Table H5c of the KWS Handbook. The abundance of each species was estimated according to the DAFOR scale. The full results of the survey are set out in Annex 5487/1 and summarised below.

5.3 Three main areas of homogenous grassland vegetation were identified within the site:

- Area A: False Oat-grass *Arrhenatherum elatius* dominant vegetation, which comprises the vast majority of the site;
- Area B: Tor-grass *Brachypodium pinnatum* dominant vegetation, which forms small stands mainly in the north of the site;
- Area C: Yorkshire-fog *Holcus lanatus* dominant grassland, which occupies a small part of the western portion of the site.

- 5.4 Analysis of the survey data finds that the majority of the site (Area A) is considered to have the closest affinity to NVC community MG1a, which is a grass-dominant, species-poor community typical of fields subject to infrequent management. Small areas of the grassland (Area B) are considered to represent an intermediate between MG1a and CG4c, based on the localised dominance of Tor-grass, but lack many of the calcareous species typically associated with CG4. A small part of the western portion of the site (Area C) is considered to represent a transition between MG1 and MG9, with a somewhat greater forb cover, but remains species-poor.
- 5.5 In all cases, the average number of species recorded per quadrat is lower than the averages for the described NVC communities, suggesting that the areas are relatively poor examples of their type.
- 5.6 Forb cover in the quadrats is very low at typically 5 – 10%. This reflects the habitat as a whole which is grass dominated at a cover which greatly exceeds the description of MG1(26a) in the UK Habitat Classification Field Key as “vegetation with over 50% grass cover”.
- 5.7 A total of 12 species of local interest, according to the KWS selection criteria, were recorded within the site, which therefore falls well short of the 20 required for selection. It is understood, that records of additional KWS species are present, although these were not collected as part of systematic surveys of the site. While some early species may be present which would not have been recorded during the current survey, the absence of others being re-recorded during the current survey reflects the very small number of individuals of such species which may be present. Given that they cannot be readily re-recorded, as they are represented at such a low frequency in the sward (and they are not rare species), it follows that they contribute little to nothing to the conservation interest of the grassland. Accordingly, these species would not be expected to be recorded during snapshot surveys carried out for KWS selection. Rather, the criteria thresholds reflect numbers of indicator species which would be expected to be able to be readily recorded during KWS surveys.

General Criteria

- 5.8 A review has been carried out of the site against the General Criteria set out in Part 2 of the KWS selection criteria handbook. This is summarised below and set out in full in Annex 5487/2.
- **Size or Extent** – does not meet the criteria as it is small in size and does not contain any exceptional or large species populations.
 - **Diversity** – does not meet the criteria as survey work has confirmed the site is not diverse beyond the context of the site itself.
 - **Naturalness and Typicalness** – does not meet the criteria as it located in a suburban location and survey work has confirmed it does not contain a notable vegetation structure, notable habitats beyond the context of the site itself, a notable mosaic of habitats or support significant populations of notable species.
 - **Rare or Exceptional Feature** – survey work has confirmed no rare or exceptional features are present;
 - **Fragility** - survey work has confirmed the habitats within the site are not of importance beyond the context of the site i.e. below the county context, and therefore the criteria is not applicable to the site.
 - **Recorded History or Cultural Associations** – not applicable as the site has not been subject to historic/long-term/traditional management practices.
 - **Wildlife Corridors and Other Connected Habitats** – does not meet the criteria due to enclosure of the site by houses on three sides and a school on one side.

- **Value for Appreciation of Nature** – does not meet the criteria as there is no public access to the site and views into the site from the surrounding dwellings would be distant and obscured by trees.
- **Value for Learning** – the adjacent school does have access to the field although at the present time, little use of the grassland is made for educational purposes. Given the currently herb poor nature of the sward, it is considered that this would not be a resource the school would turn to for grassland botanical studies.

5.9 Based on the review carried out, the site does not meet any of the General Criteria.

6. Summary

6.1 A review has been carried out to determine whether the site may meet the identified criteria to qualify as a KWS. The review has been informed by survey work carried out at the site including habitat survey, botanical survey and faunal surveys.

6.2 In order to potentially qualify as a KWS, a site must meet at least one of the General Criteria set out in Part 2 of the KWS Handbook, AND, in relation to grassland sites, confirm to one of the listed NVC communities AND contain a number of listed species above a particular threshold (from a list of species occurring on grassland of highest conservation concern is Gloucestershire). Where sites may qualify on the basis of these criteria, the site is put forward to the Gloucestershire Wildlife Sites Partnership Site Selection Panel for consideration as a KWS.

6.3 The review finds that the site does not meet any of the nine General Criteria, whilst detailed botanical survey work carried out in August 2020 finds that the majority of the site is considered to have the closest affinity to NVC community MG1a, which is a grass-dominant, species-poor community typical of fields subject to infrequent management. Only 12 listed notable species were recorded and therefore the site falls well short of meeting the threshold of 20 species for MG1 grasslands. The botanical survey has been carried out by an experienced botanist with a detailed report presented. As set out in the KWS handbook Part 1 at paragraphs, 3.5 and 3.6, surveys not carried out by suitable experienced professionals should be considered to be unreliable, whilst as stated in paragraph 3.4, data acquired under trespass should be disregarded.

6.4 In conclusion, detailed botanical survey work, coupled with a review of the General Criteria finds that the site, in our opinion, does not meet the required criteria for designation as a KWS. Indeed, should it be designated it would serve to de-value the series as a whole through the inclusion of a non-key site.

Annexes:

- 5487/1 Results of August 2020 Botanical Survey Work and CV of Ecologist carrying out botanical survey work
- 5487/2 Review of the site against the General Criteria for KWS site selection