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Warrington Local Plan Preferred Development Option Consultation 2017

Comments from the Cheshire Wildlife Trust 29/09/17

The Cheshire Wildlife Trust is the leading conservation charity in Cheshire that focusses on all aspects of wildlife. In our response to the consultation for the Preferred Development Option Regulation 18 we seek to represent the views of our 12,000+ local members. There are a number of issues we would like to raise which we have set out in our response below.

We are particularly disappointed that the report fails to mention or take into account biodiversity obligations (including mitigation and enhancement). Reference should be made to:

- Ecological networks and conserving and enhancing biodiversity (NPPF paragraphs 109,113,114,117 and 165 Section 40 of the Natural Environment and Rural Communities Act 2006, EU Biodiversity Strategy 2020)
- Warrington Local Plan Borough Wide Strategy - Securing a high quality environment ' *identify, conserve restore and where appropriate enhance key features, sites and areas of international, regional and local significance for biodiversity and geodiversity and contribute to the delivery of the local Biodiversity Action Plan targets*'
- Biodiversity and Geodiversity Policy QE5.

Garden City Suburb

This potential allocation/safeguarded land includes 3 designated Local Wildlife sites (SINCs) namely Grappenhall Hayes Part 1, Grappenhall Hayes Part 2 and the Dingle and Fords Rough. There are also numerous areas of habitat of principal importance and land likely to be recognised as such, including: The Gorse, Tong's covert, The Dungeon, Barry's Covert, Gallows Croft, Damhead covert, Thelwall Gorse, woodland by the Bridgewater canal and Massey's Brook. The area also supports one of the highest densities of farm ponds in the Cheshire region, many of which will be habitat of principal importance and may support protected and priority species.

In accordance with the mitigation hierarchy set out in the NPPF these areas should be protected from development (i.e. avoidance measures); for example a minimum 15 metre buffer will be required to protect important habitat. No net loss/net gain of biodiversity policies (including indirect effects and the delivery of the local Biodiversity Action Plan targets and the contribution to ecological networks) should be applied as set out in the NPPF paragraphs 9, 109,113,114,117 and 165 and the Warrington Local Plan Borough Wide Strategy – 'Securing a high quality environment'.

Consideration must be given to how development of this site would affect the strategic Ecological Network for Warrington (refer to our comments below). A final decision should only be taken once this piece of work is complete and the wider implications for biodiversity are clear.

Warrington Waterfront

This potential allocation includes one designated Local Wildlife Site (SINC), Moore Nature Reserve. The plans for Port Warrington incorporate part of this designated site. In accordance with the mitigation hierarchy set out in the NPPF and Warrington's own planning policies 'Securing a high quality environment' policies QE3 and QE5, this area should be protected from development.

Policy QE5 states specifically that the reasons for development will need to 'outweigh the need to safeguard the substantive nature conservation of the site'. The policy also states that 'should development go ahead the council will consider the use of conditions or planning obligations to ensure the protection and enhancement of the site's nature conservation in interest and/or provide appropriate compensatory measures'.

No net loss/net gain of biodiversity policies (including indirect effects and the delivery of the local Biodiversity Action Plan targets and the contribution to ecological networks) will need to be applied as set out in the NPPF paragraphs 9,109,113,114,117 and 165 and the Warrington Local Plan Borough Wide Strategy – 'Securing a high quality environment'.

CWT advise that the compensatory measures required to ensure no net loss of biodiversity and to comply with local and national planning policies are substantive given the scale of the proposed losses and the intrinsic biodiversity value. Our estimation of the costs of ensuring 'no net loss' of biodiversity using compensatory measures are in the region of £1-2 million. This will be reduced if avoidance measures are implemented (NPPF mitigation hierarchy).

Given the likely substantive losses of biodiversity as a result of the Port Warrington scheme the Cheshire Wildlife Trust ***objects*** in the strongest possible terms to the inclusion of this site as a preferred option for development. The nature reserve is important on a regional basis for the habitats/species of principal importance it supports. The species-rich grassland, reedbeds and woodland are important for insects such as dragonflies, bees and butterflies and significant populations of breeding and wintering birds also use the site. The nature reserve is an important educational resource for local children who regularly attend Wildplay and Nature Tots events. Developing this site would be highly damaging to local biodiversity, the local community and environmentally unsustainable.

Strategic Ecological Network Mapping of the Warrington Area

To underpin the allocations, and in accordance with the explicit guidance on ecological networks provided in the NPPF (paragraphs 109,113,114,117 and 165), it is vital that the Warrington Ecological Network is mapped before a final decision is made upon the development option. This evidence should sit alongside mapping of green infrastructure and should:

- Provide a strategic context (i.e. ecological network map) for planning the distribution of development and infrastructure in harmony with nature and the promotion of health and well-being.
- Strategic evidence based ecological network mapping should identify where resources should be prioritised, enabling targeting for biodiversity compensation/offsetting measures (i.e. 'net gain' for biodiversity approach).
- Strategic mapping should identify which habitats are most appropriate and where.
- Strategic mapping should aim to direct an increase the size, quality and quantity of priority habitat
- Strategic mapping should identify buffers for 'core areas' designated for nature conservation (including Local Wildlife Sites).
- Strategic mapping should identify critical conflict points where the ecological network may be compromised.
- Strategic mapping should be used as targeting for agri-environment, river catchment partnership plans and landscape scale initiatives.
- Strategic mapping should reflect multiple benefits (ecosystem services)

The Cheshire Wildlife Trust believes that in order to be *fit for purpose* the Ecological Network mapping approach should have the following objectives:

- It should be evidence based, objective and *live* so that updates can be readily incorporated.
- Use up-to-date/quality data.
- Follow best current practice
- Be endorsed by the LNP boards of neighbouring regions (recognising ecological networks cross administrative boundaries – NPPF para 117)
- There should be wide partnership buy-in especially from delivery partners (such as the Wildlife Trusts).
- It should be easy to use (especially in a planning context)

In order to meet the above objectives the mapping methodology should:

- Be robust i.e. it should avoid being too simplistic (ignoring landscape permeability, habitat type, quality and size of sites and avoid broad-brush buffering)
- Incorporate a minimum of 3 different models (networks) based on either 3 broad habitat types or 3 generic (focal) species.
- Ideally it should be based upon the assumption of least cost path routes for typical species dispersal (generic focal species).
- Networks should be scored for Coherence (degree of connectedness) and Resilience (hostility of land adjacent to network)

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