



Nottinghamshire
Wildlife Trust

The Old Ragged School

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For the Attention of Lisa Snow, Programme Officer

By email 13 November 2018

Nottinghamshire Wildlife Trust's further written statement in relation to:

1. Matter 9: Policy 5.1 Land East of Church Lane, Brinsley

As you will be aware, Nottinghamshire Wildlife Trust (NWT) submitted the following comments on the LPP2 in relation to Policy 5.1:

We would have preferred to have seen the alternative site included (option 2) rather than this one (option 1) for the reasons provided in our response to the Brinsley Alternative Site Consultation February 2017:

“Option 1 is located immediately adjacent to Brinsley Headstocks Local Nature Reserve and associated Local Wildlife Sites, Brinsley Brook Grassland LWS (5/2302) and Brinsley Headstocks LWS (5/3405), which are identified for their botanical interest. The wildlife value of Brinsley Headstocks, which has been well recorded, may be harmed by any substantial increases in recreational use, which would be inevitable if Option 1 is taken forward.

The LNR and adjacent land is considered locally by members of the Friends Group and others who carry out regular birdwatching locally, as being more valuable for birds. This is certainly likely because the LNR itself supports more structural diversity in its habitats, with areas of woodland, plantation, hedges alongside meadows and the Brinsley Brook. These features are largely lacking from land within Option 2, which is predominantly arable. The LNR currently has good, strong habitat connectivity along the brook and to Saints Coppice to the north, which could be adversely affected by built development if Option 1 is taken forward.

Option 1 contains areas of permanent grassland whereas the majority of land within option 2 is mainly arable, which contains no known botanical interest is less valuable in wildlife terms, apart from hedges which we would like to see sensitively retained within any development”.

Local residents have reported that the fields in the vicinity of the Brinsley allocation included in the current consultation support a number of wintering farmland bird species. We are also concerned about possible hydrological impacts on the Brinsley Brook. As this allocation is within the catchment for the watercourse there is the potential for adverse impacts on the ecology of the brook due to increased runoff rates, contamination (directly or indirectly, via any new drains) etc.

Modification sought

Replace this site allocation with 'option 2'.

President

Sir Andrew Buchanan Bt.

Registered Charity No.
224168R

NWT would like to take this opportunity to submit further information to expand on the points made previously, in order to fully explain our concerns in relation to the East of Church Lane allocation.

As well as areas of permanent grassland mentioned above, the allocation site contains mature hedgerows which are species-rich, containing species such as hawthorn, blackthorn, hazel and mature ash and oak trees. The hedges may qualify as 'important' under the *Hedgerow Regulations* (1997) and will meet the definition of priority habitat, or habitat of principal importance in the Nottinghamshire and UK Biodiversity Action Plan respectively.

We have already mentioned that the site is immediately adjacent to one Local Nature Reserve, Brinsley Headstocks and two Local Wildlife Sites, Brinsley Brook Grassland LWS (5/2302) and Brinsley Headstocks LWS (5/3405).

In terms of their interest, both LWSs are identified on botanical criteria: Brinsley Brook Grasslands supports notable neutral grasslands and the Headstocks is a former colliery site with notable flora. The LWS designation is based on surveys carried out by the Nottinghamshire Biological and Geological Records Centre in 2010 and 2014 and, across the site, the Friends of Brinsley Headstocks (FoBH) has compiled a plant species lists containing 292 species.

The headstocks support a huge variety of faunal species, lists of which have also been compiled by the FoBH. Nottinghamshire Wildlife Trust, in consultation with the FoBH, Broxtowe Borough Council and Greenwood Community Forest updated the LNR management plan in 2016. A copy of the management plan and appendices, including species lists has been provided at Appendix 1.

Key species noted include:

- **Brown hare** within the LNR and on the allocation site. (Priority Species/ Species of Principal importance, also known as BAP, Biodiversity Action Plan species).
- **Grass snake** within the LNR and likely to spend part of their lifecycle within the allocation site (Wildlife and Countryside Act, WaCA protected, BAP species).
- **Bats**, including common pipistrelle, brown long-eared and Noctule (European Protected, WaCA and BAP species).
- 21 species of **butterflies**, some of which e.g. small heath are BAP species).
- 117 species of **moth** (at least 8 BAP species and several additional 'conservation grade' species).
- 60 species of **Fungi**.



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Within our previous comments we noted the wintering **bird** interest at the allocation site and within the vicinity of the headstocks, which includes redwing, fieldfare, siskin, goldcrest and brambling. Having mentioned wintering birds alone underrepresents the importance of the headstocks and adjacent fields for its all year round bird interest, where 85 species in total have been seen and where at least 18 Red Listed Birds of Conservation Concern have been seen (not all confirmed breeding). Those considered to breed along the Brook immediately adjacent to the allocation include blackcap, chiffchaff, little owl and bullfinch. Also of interest within the adjacent woodlands is tawny owl (possibly breeds nearby), green and greater spotted woodpecker, nuthatch and treecreeper, with occasional willow tit, a Red List and priority species which is very much in decline and utilises the wet woodland habitats on site.

In terms of fauna, the majority will not be contained to the site and would be negatively impacted by a development immediately adjacent. As well as fragmenting the site in the landscape, other impacts such as noise, light spill and increases in cat predation, increased footfall and disturbance by people in general (walkers and cyclists and potential motor bike scrambling, dogs off leads, children playing in the brook, littering and dumping etc). A study by Yorkshire Wildlife Trust, published in 'In Practice' (Issue 97, September 2017, Bulletin of the Chartered Institute of Ecology and Environmental Management), has shown negative impacts of developments adjacent to Local Wildlife Sites and nature reserves, with the greatest levels of disturbance and damage found within 500 metres. The article recommends that the first step in the planning process should be to locate new housing developments at least 100 m from reserves, and ideally more than 500 m away. A copy of this study can be obtained via <https://connectingfornature.wordpress.com/2017/11/16/human-impacts-on-nature-reserves/>.

We have previously mentioned flooding and issues in relation to contamination of the water environment at Brinsley Brook. As this allocation is within the catchment there is the potential for adverse impacts on the ecology of the brook due to increased runoff rates, contamination (directly or indirectly, via any new drains) etc.

There is currently much focus on protection and enhancement of the water environment through the Catchment Based Approach (CaBA) and the catchment partnerships, which in this area is the Lower Trent and Erewash, co-ordinated by the Trent Rivers Trust, is very active. The brook is lies within the Nethergreen Brook catchment. Whilst this catchment is currently (as of the 2016 assessment) in overall 'moderate' condition, the downstream catchment is River Erewash (Nethergreen Brook to Gilt Brook), which is in overall 'poor' condition, especially due to point source sewage discharge (source Environment Agency Catchment Data Explorer). Any new discharges may harm the river environment, which is contrary to our obligations under the Water Framework Directive (WFD). In this regard, we would strongly recommend any proposals are supported by a WFD assessment. Please refer to this document for detailed guidance:

President

Sir Andrew Buchanan Bt.

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<https://catchmentbasedapproach.org/wp-content/uploads/2018/10/engaging-with-the-water-framework-directive.pdf>

To qualify for LNR status, a site must be of importance for wildlife, geology, education or public enjoyment and Brinsley Headstocks qualifies on all of these grounds. We wish to draw attention to the importance of the LNR to local people, including the committed local group, Friends of Brinsley Headstocks. In particular, local people feel strongly that the site's ecological integrity must remain intact.

There is much research that proves the links between nature and health and wellbeing. The Wildlife Trusts has published four reports based on this theme: <https://www.wildlifetrusts.org/nature-health-and-wild-wellbeing>. This is another reason to protect the headstocks site from any inappropriate development.

2. Matter 7: Toton Strategic Location for Growth

In relation to item 1, *What evidence is there that the site will be ...sustainable and ...viable*, we question its ecological sustainability and whether it is viable, due to a large proportion of the site being located within floodplain.

In the fourth paragraph of our response to LPP2 (policy 3.2), we would like to add that there is little scope for putting in flood storage measures because the River Erewash, especially at this location, has such a narrow floodplain. It is squeezed by built-up land on either side of the valley.

In relation to our comments on 'informal' open space (paragraph 6 of our response) we would like to highlight the importance of wildlife-rich green space both to biodiversity conservation and to health and wellbeing and refer to the research carried out by The Wildlife Trusts: <https://www.wildlifetrusts.org/nature-health-and-wild-wellbeing>.

We hope you can consider our additional submission, which aims to provide a more detailed explanation of our concerns. If you require any further clarification please do not hesitate to contact me.

Yours sincerely,

Ben Driver, Southern Conservation Officer

Attachment

Appendix 1 Brinsley Headstocks LNR Management Plan