

Woodgrove Farm
Chapel Lane
Bubblewell
Minchinhampton
Gloucestershire
GL6 9DL

01453 886283

Humphrey Mpezeni
Planning Department
Stroud District Council

6 September, 2015

Dear Mr Mpezeni

Application S.15/1922/FUL Well Hill Fields: Erection of 5 new dwellings and promotion of associated community orchard

The Minchinhampton Walking and Wildlife Group, and specifically its undersigned members, wish to object to the above application on the grounds that it would:

- a) Contribute to a significant adverse effect on Rodborough Common Special Area of Conservation. SACs are protected by the European Habitats Directive, the Habitats and Species Regulations, paragraphs 118 and 119 of the National Planning Policy Framework (NPPF) and Stroud District Council's Adopted Local Plan (LP) Policy NE1 and Emerging Local Plan (ELP) Policy ES6.
- b) Contribute to an adverse effect on Minchinhampton Common Site of Special Scientific Interest. SSSIs are protected by the Wildlife and Countryside Act, paragraph 118 of the NPPF, LP Policy NE2 and ELP ES6.
- c) Adversely affect a site which meets the criteria for Key Wildlife Sites in Gloucestershire. KWSs are protected by LP Policy NE3 and ELP Policy ES6;
- d) Adversely affect a site which supports legally protected (Priority) species and Priority Habitats. These features are protected by the NPPF, LP Policy NE4 and ELP Policy ES6;
- e) Adversely affect a wildlife corridor/ ecological network. Wildlife corridors are protected by the LP Policy NE5. Ecological networks are protected by ELP Policy ES6.
- f) Adversely affect the headwaters of the stream which drains from Minchinhampton into the Avening Brook. This is referred to below as the 'Hampton' stream. Natural water courses are protected by LP Policy NE7 and ELP Policy ES6.

These issues are expanded below.

Adverse effect on Rodborough Common SAC

1. Under-grazing is recognised as a potential threat to the character and quality of the Lowland Calcareous Grassland for which Rodborough SAC is notified (SDC LP Habitats Regulations Assessment, URS, November 2014, page 49). The Old Vineyard field currently provides winter and spring grazing for a herd of Highland Cattle which graze Rodborough (and Minchinhampton) Common during the summer and autumn. This proposal would reduce the area available for cattle grazing by approximately 50%. The retained part of the field may not be a viable cattle-grazing unit and will certainly not be able to support as many cattle as it does at present. Without such 'lay back' land, the common's graziers cannot keep sufficient livestock to graze the common.
2. Small livestock farms in the area have already been lost to housing development (eg Barcelona Farm, Minchinhampton) and others are threatened with development (eg Glebe and Tobacconist Farms, Minchinhampton). In combination, this reduction in lay-back grazing land around Rodborough Common is likely have a significant adverse effect on the system which maintains the grasslands of the Common.
3. The proposed houses are within the 3km zone within which most visitors to Rodborough Common are known to live. They are therefore likely to contribute to the recreational pressure on the SAC, which is known to be having an adverse effect on the grassland for which the site is notified (SDC LP Habitats Regulations Assessment; URS as above).

Adverse effect on Minchinhampton Common SSSI

4. Minchinhampton Common also depends on grazing to maintain the large area of Lowland Calcareous Grassland for which it is designated an SSSI. The effects on Rodborough Common described above are therefore also likely to apply to Minchinhampton Common.
5. Minchinhampton Common also qualifies as an SSSI because of the series of disused stone mines accessed from the Balls Green area, which are used as winter roosts by bats, including the rare Greater Horseshoe bat. This species and the Lesser Horseshoe bat are known to forage around Minchinhampton, as they have a night time roost (where they digest their food) at Woodgrove Farm, approximately 300m to the south of the site. As insects associated with cattle dung are an important part of their diet, the proposed reduction in cattle grazing is likely to contribute to a significant adverse effect on the population for which the SSSI is designated.

Adverse effect on a site which meets Gloucestershire's Key Wildlife Site Criteria

6. From reference to CTM Wildlife's Ecological Survey report dated 8 July 2015 and a survey of the site conducted by Phil and Karen Colebourn in 2010, it is clear that the Old Vineyard Field meets the following KWS criteria, as set out in the *Gloucestershire Key Wildlife Sites Handbook, Part 2 v3.1*:

a) Diversity

The site contains the following range of semi-natural habitats in close proximity:

- Lowland Calcareous Grassland, a UK Priority Habitat;
- A species-rich pond, a UK Priority Habitat;
- The headwaters of the ‘Hampton’ stream, a UK Priority Habitat;
- The ‘Hampton’ stream which supports a European Protected Species, a UK Priority Habitat;
- Marshy grassland associated with the pond, springs and stream, a Local Priority Habitat.

The calcareous and marshy grassland each support sufficient species to qualify as a KWS, but are not large enough to qualify on their own. However, at H5.3 and H5.8 of the criteria it states that smaller habitat patches qualify ‘*where they occur in connection with other qualifying habitats, either as a mosaic or as an adjacent patch*’.

b) Naturalness and Typicalness

The field is an excellent example of the mosaic of habitats typical of the distinctive Stroud Valley slopes. The range of habitats described above derives naturally from the geological structure of this part of the Cotswolds, where layers of permeable limestone are separated by a layer of relatively impermeable Fullers Earth, forcing water to the surface in a spring line.

c) Rare or Exceptional Features

- The site supports Common Calamint, which is a misnomer, as it is an uncommon plant in Gloucestershire, and is known to be declining nationally.
- The pond supports an unusually rich assemblage of four amphibians, including Palmate newts, which have a limited distribution in Gloucestershire.
- Approximately 300m below the site, there are large deposits of tufa in the ‘Hampton’ Stream, a nationally rare phenomenon, for which the Stroud Valleys have only recently been recognised. The ‘Hampton’ Stream, which rises in the Old Vineyard Field, has some of the best tufa deposits in the Stroud Valleys. It is dependent on geological and organic processes working together in an exceptionally clean water environment.

In addition, there are species which occur locally in similar habitats, for which the site should be checked:

- The assemblage of bat species that are likely to forage over the field. The data search reported in the CTM report refers to records of at least 11 species of bat within 2km, including rare species such as Bechsteins, and Barbastelle as well as the Lesser and Greater Horseshoe bats which are known to roost nearby. This exceptional assemblage of bats is of national value.
- Meadow Clary, the rare plant for which Box Farm Meadows is designated an SSSI, within 800m of the Old Vineyard field. After flowering in June-July it almost totally disappears and therefore could have been missed in the late August/ mid September survey.

- Roman Snails, protected by the Wildlife and Countryside Act are known to occur in large numbers within 300m of the site.
- The assemblage of reptiles: Adder and Grass Snake have been recorded within 50m of the site, which is also suitable for Common Lizards. Slow Worms have been recorded on the site.

d) Connectivity within the landscape

- Old Vineyard field is part of the corridor of fields, parkland, gardens and woodland along the valley side on the southern edge of Minchinhampton. There is a small traditional orchard two fields away to the south. Further away are the open grasslands of the commons and wooded valley sides.
- This landscape, as a whole, supports the following Priority Species: Greater and Lesser Horseshoe bats, Barbastelle, Bechstein's and Brown Long-eared bats, Otters and White-clawed Crayfish;
- The field is within the 'Cotswold Escarpment and Valleys' Priority Landscape in Gloucestershire. It links two Strategic Nature Areas: Box SNA, which starts c200m to the south and the Minchinhampton SNA, which is 600m to the west. Lowland calcareous grassland is the lead habitat in both SNAs.
- The field is part of an interconnected system of grazed grasslands that act as critical run back land and thus support Minchinhampton and Rodborough Commons (SSSI/SAC). It has direct access to the Common within Minchinhampton town.

e) Fragility

The habitats and species supported by this site are vulnerable to loss or damage through:

- changes in land management;
- changes in hydrology;
- aquatic pollution (including siltation); and
- light pollution.

The proposed development would introduce these threats.

Adverse effect on Priority Habitats and Species

7. The proposal is likely to threaten the Priority habitats and species supported by Old Vineyard Field in the following ways:

a) Lowland Calcareous Grassland

As well as the effects on the internationally and nationally important examples of this habitat on Rodborough and Minchinhampton Commons described above, it will also be affected where it occurs on the Old Vineyard Field. Whilst the best area of this habitat on the site is within the area to be retained, there is also a patch where it is proposed to build 'The Barn' and its garden. This Lowland Calcareous Grassland would therefore be destroyed.

The remaining area of this habitat requires regular grazing in order to retain its conservation status. By reducing the grazing unit by 50%, it's attraction to graziers would be much reduced. This proposal therefore increases the risk that this grassland bank will, like many others in the Cotswolds, become over-grown with scrub and coarse grasses and lose its less competitive species, such as the locally rare and declining Common Calamint.

At present the cattle feeder is located just inside the roadside gate. The immediately surrounding area is heavily poached by cattle, an unavoidable consequence of winter grazing. As, for obvious reasons, graziers prefer feeders to be close to a gate, if cattle grazing does continue, it is very likely that the grassland around the proposed new field access would become damaged by poaching. From the 2010 survey, the proposed gate appears to be in or near a shallow ditch on the edge of Lowland Calcareous Grassland. If the extent of the poached area was similar to that in the current field, it is very likely that some of the Priority habitat would be lost or damaged.

b) The Pond

This spring-fed pond supports an unusual assemblage of four amphibians. This includes Palmate newts, which have a limited distribution in Gloucestershire. These animals breed in the pond, but forage and shelter in terrestrial habitats, such as tussocky grassland, during other phases of their life. Appropriate safeguarding measures would therefore be required during construction, to avoid damage to the assemblage of amphibians which this use this feature.

c) The Headwaters of the 'Hampton' stream

The 1:25,000 OS Map shows two springs in the field, one at the pond and another just below. These join to form a stream which may have been impounded in the past, but which currently runs through the lower southern part of the field. Another spring rises approximately 200m to the south-west and flows along the lower part of the southwest boundary of the field.

The plan shown at 2.3.1 of the Design and Access Statement shows a '*Balancing pond, restored and managed for biodiversity*' in the area where the stream flowing from the Old Vineyard field springs may have once been impounded. As a balancing pond, this would presumably receive run-off from the new access road and hard-standing within the proposed development. This would introduce the risk of pollution to these headwaters, from spillages of fuel and other noxious substances.

d) The 'Hampton' stream

White-clawed crayfish were recorded in the lower reaches of the 'Hampton' stream in 2013. This European Protected Species is declining throughout the UK and there is evidence that the local population has declined rapidly in the past 10 years. This species occurs only in clean water and its local survival would be threatened by increased risk of pollution.

The recently discovered tufa beds are also dependant on clean water and would therefore also be threatened by an increased risk of pollution.

e) Marshy grassland

This is associated with the pond, springs and stream. It depends on grazing in order to maintain its conservation status. The pond and stream are shown in the masterplan as being fenced off from the cattle. Without grazing these areas would be quickly over-grown by rank vegetation unless other forms of management are introduced. No indication is given at present as to how this might be achieved.

f) Assemblage of Bats

Horseshoe bats feed on invertebrates dependent on cattle dung. Any reduction in cattle-grazed land would contribute to the threats to the nationally important assemblage of bats in this area.

Many bats feed on invertebrates associated with ponds, streams and marshy grassland. Any loss of diversity through pollution or change in management would affect the invertebrate community and their predators.

It is also very likely that the proposed development would introduce lighting into an area which is currently dark. Horseshoe bats are sensitive to lighting and, alongside other nocturnal and crepuscular animals, are likely to be adversely affected by this change.

Adverse effect on a Wildlife Corridor / Ecological Network

8. From the above we hope it is clear that the Old Vineyard field plays an important role in supporting both the structure and function of a network of internationally, nationally and locally valuable habitats and species. Whilst the scheme has been redesigned to avoid the irreversible destruction of one of the important habitats on site, the alternative proposal is still likely to reduce the capacity of this part of the Stroud Valleys to support the very rich community of animals and plants which currently live here.

The following members of the Minchinhampton Walking and Wildlife Group have confirmed their wish to support this objection.

Marin Anastassov	Rosalind John
Geoff Brown	Mary McEllin
Peta Bunbury	Michael McEllin
Sally Byng	Mary Matthews
Karen Champney	Tony Metcalfe
Alan Clark	John Rasmussen
Helen Clark	Terry Robinson
Karen Colebourn	Celia South
Phil Colebourn	Robert South
Jane Davidson	Trish Swindells
David Gomm	Sheelagh Witcombe
Muriel Gomm	Jacquie Hanks
Beris Hanks	