

## Natalie Hayward

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**From:** Annie Gordon <AnnieG@essexwt.org.uk>  
**Sent:** 24 April 2012 13:32  
**To:** Natalie Hayward  
**Cc:** 'Phil Hitchman'  
**Subject:** Gt Wakering site allocation WGW3

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Natalie,

Thank you for contacting Essex Wildlife Trust regarding Site Allocations Option WGW3.

The Trust was contacted by residents of Alexandra Road who were very concerned about some site clearance work of the scrub habitat to the rear of their gardens, which had been undertaken by the site owners a couple of weeks previously, in the middle of the bird nesting season (thus potentially breaching the Wildlife and Countryside Act). I visited the site on 2nd April in order to meet with the residents and conduct an informal walk-over survey to assess the situation.

The land comprising Option WGW3 is an area of dense hawthorn/blackthorn scrub and young and semi-mature trees, which forms an important extension and valuable buffer habitat adjoining Star Lane Pits Local Wildlife Site. This area of scrub is rich in wildlife and provides essential nesting and foraging habitat for numerous bird species; during my visit I recorded the following species using the site: blackbird, song thrush, robin, dunnoek, bullfinch, chaffinch, greenfinch, goldfinch, house sparrow, blue tit, great tit, long-tailed tit, jay, starling, green woodpecker and great spotted woodpecker. In addition, residents have noted yellowhammers (seriously declining nationally), sparrowhawks, kestrels and the now rare cuckoo.

Other important and protected wildlife species which have been recorded on site WGW3 include bats, badgers, slow worm, grass snake, common lizard, adder and great crested newt.

There is a general lack of awareness of the importance of even species-poor scrub for the nature conservation interest of a site. The presence of scrub is seen as negative on many sites and species-poor scrub is often overlooked or actively disparaged as a habitat; however, it can support a large number of species of conservation interest and is essential to many species listed on the UK Biodiversity Action Plan.

Scrub as a habitat on its own where there may be significant invertebrate, mammal or bird interest present includes hawthorn scrub, which supports breeding birds such as linnet, bullfinch, turtle dove, blackcap, whitethroat and lesser whitethroat, which are all listed in the UK Biodiversity Action Plan; and blackthorn scrub, which provides valuable habitat for the brown hairstreak butterfly and the long-tailed tit. In each case there will be many other species, especially invertebrates, which benefit from or depend on this habitat. Scrub as part of a mosaic, including scrub on the edge of reedbeds (as occurs on this site), provides habitat for sedge warblers and reed warblers.

For many species scrub is important for some part of their ecology; although they only spend a small amount of time in the scrub, it has a crucial importance. An example would be farmland birds such as the yellowhammer and tree sparrow, which feed in the open but near enough to scrub to be able to retreat if danger threatens. For many grassland butterflies scrub provides important shelter from the prevailing wind and helps maintain a warm micro-climate. Isolated bushes in open sites are often very significant as nest sites for birds such as the grasshopper warbler, and as song posts for other species such as stonechat and linnet.

Star Lane Pits LoWS and the adjoining scrub habitat represent a biodiversity 'hotspot' in an area which is predominantly composed of residential developments and agricultural land. The clearance and development of site WGW3 would not only result in a major reduction in biodiversity on the site itself; the

loss of this site would result in an additional adverse impact on the biodiversity of the adjoining local wildlife site, leaving it isolated and severing the habitat network connecting it to the wider landscape.

The government's National Planning Policy Framework guidelines on conserving and enhancing the natural environment include the following statements:

(paragraph 109) '*minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures*'

(paragraph 110) '*Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.*'

(paragraph 114) '*Local planning authorities should:*

- *set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure*'

(paragraph 117) '*To minimise impacts on biodiversity and geodiversity, planning policies should:*

- *plan for biodiversity at a landscape-scale across local authority boundaries;*
- *identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*
- *promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan*'

(paragraph 152) '*Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.*'

I am unsure as to why the Trust did not provide any comments regarding site allocations in 2010, as I was not employed in this post until the latter part of 2011; I would like to apologise for this apparent oversight. Having now examined the list of proposed housing development sites, I would like to offer the following comments:

Option WGW1 - this option would have a moderate adverse impact on the local wildlife site due to disturbance, noise, increased recreational pressure and potential increased predation by cats. However, if this option included conditions for the sensitive enhancement of the LoWS and the adjoining scrub habitat (site WGW3) for the benefit of wildlife and protection/enhancement of biodiversity, this would provide reasonable mitigation.

Option WGW2 – this option would have a low impact on the LoWS and adjoining scrub habitat, and is unlikely to result in any significant loss of biodiversity.

Option WGW3 – this option entails the total loss of the wildlife-rich scrub habitat adjoining the LoWS. This habitat supports many important species and plays a key role in buffering and linking the LoWS to the wider landscape, thus enhancing the biodiversity of the LoWS. Clearance and development of this site would have a major adverse impact on the LoWS and result in a major reduction in biodiversity in the area.

Option WGW5 – this option would have a low impact on the LoWS and adjoining scrub habitat, and is unlikely to result in any significant loss of biodiversity.

The local residents have informed me that, in conversations with the owners of the land incorporating WGW1 and WGW3 (Inner London Group), the developers have indicated their intentions to (a) completely clear the scrub habitat from site WGW3 and (b) to 'level' the local wildlife site and provide picnic areas, 'tidying' it and turning it into a recreational space for people. Both of these proposals will seriously damage

the wildlife interest of the area and have a major adverse impact on biodiversity. Essex Wildlife Trust would urge you, as the local planning authority, to ensure that this important wildlife habitat (the LoWS and site WG3) is protected from development and sensitively managed for the enhancement of biodiversity and the quiet enjoyment of local people.

The Trust appreciates being given the opportunity to comment on this issue; if you would like any further information please do not hesitate to contact me.

Kind regards,

*Annie Gordon*

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