

APPENDIX 1

LITTLE FLEXFORD NORMANDY

ENVIRONMENTAL STATEMENT



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Date:	20/03/2017
Ref:	ACD19087
Revision:	Rev A June 2017

1.0 Background and Executive Summary

- 1.1. ACD were instructed to undertake a Visual Impact Assessment, ecological survey, tree survey and prepare landscape proposals for a new housing scheme located at Little Flexford, Normandy, Guildford by Crownhall Estates in June 2014.
- 1.2. The site is currently two grazing paddocks on the eastern edge of the village of Flexford, near Normandy. The east of the site is bound by a belt of trees beyond which is a small residential estate, The Paddocks. The north of the site is edged by a narrow belt of trees and the railway, beyond which are fields. Along the western boundary is a mature hedgerow that runs along a lane, Flexford Road leading to a farm. To the south of the site is a newly planted hedgerow that forms a boundary between the site and a large residential property.
- 1.3. No planning application was made, as Guildford Borough Council's Local Plan was not yet in place.
- 1.4. It now seems that Guildford Borough Council are concerned that development of the site would adversely impact the SNCI designation at Little Flexford.
- 1.5. ACD has prepared a full suite of supporting information, including the ecology, arboriculture and visual assessment, all of which have informed the Landscape Masterplan, which includes all mitigation recommendations.
- 1.6. The proposed layout has been revised and developed to accommodate all the recommendations of the different environmental reports and will have no adverse impact on the SNCI features of the site.
- 1.7. This Environmental Statement includes elements from the ecological, arboricultural and landscape assessments, and demonstrates unequivocally that the development will **not** adversely impact the SNCI designation, but will retain and enhance the water-vole and grass features.

- 1.8. It concludes that, if left in current usage for horse grazing, both SNCI features risk future damage, and development with the proposed layout offers the best opportunity for the features to be retained, protected and the ecological value enhanced through future sympathetic management of the open spaces.

2.0 Environmental Summaries

- 2.1. ACD has prepared a full suite of environmental reports that have informed the proposed development.

Visual Impact Assessment

- 2.2. ACD were instructed to undertake a Visual Impact Assessment in June 2014. The site and its surrounding landscape were assessed and a total of twelve viewpoints were selected to represent a variety of receptors in the surrounding area.
- 2.3. The aim of the original report was to provide a full assessment of the potential landscape and visual effects of a proposed development upon the receiving landscape, in line with current legislation and guidance. It is comprised of two main assessments, the first for landscape and the second for visual effects and was conducted in accordance with published best practice guidelines, including a desk study; (review of local plan policies, published landscape character assessment and production of a computer generated Zone of Theoretical Visibility (ZTV)) and onsite observations.
- 2.4. It was considered that local area has many obvious manmade elements, and the proposed scheme would not be out of character with its surroundings when considered as part of the larger landscape.
- 2.5. Mitigation measures were suggested and, with the implementation of a successful mitigation strategy, the overall impact on the landscape was considered to have a small overall effect on the surrounding landscape character and visual impact. It should be considered that this type of development is not out of character within the receiving landscape.
- 2.6. The majority of the assessment was not classified as 'significant' under the EIA Regulations and the viewpoints have been re-assessed during February 2017 and there have been no changes or variations to the landscape to change the assessment conclusions.

Arboriculture

- 2.7. ACD initially carried out a tree survey, and produced constraint details in accordance with BS5837:2012 Trees in relation to design, demolition and construction. This was to identify the quality and value of existing trees on site, allowing decisions to be made as to the retention or removal of trees during development. Subsequently, the subject layout has been produced and is in line with recommendations of the British Standard, only requiring the removal of four low quality trees (category C & U). The route of the access road was specifically aligned to avoid the RPA of the principal tree on site: oak T5, ensuring adequate protection can be provided to ensure all retained trees are protected throughout development

Ecology

- 2.8. Ecological surveys were carried out by both ACD Environmental and Surrey Wildlife Trust, the results of which have been used to design a scheme which will mitigate any significant effects and enhance the SNCI interest.
- 2.9. The site meets the criteria for SNCI designation due to the presence of water voles (a water vole latrine was recorded in 2016). However the grassland habitats within the site are currently over-grazed and significantly degraded. None of the notable plants previously recorded in 1995 were found in 2016. Two different notable plant species were recorded within the site, but the botanical interest has clearly declined.
- 2.10. The scheme has been designed to retain, protect and enhance key ecological receptors within the site. This includes; retaining the stream within a 16m buffer, wildlife beneficial SuDS features, and an offline wildlife pond. These measures will create a net area of habitat for water voles, and will protect and allow further colonisation of the two notable plants recorded by the SWT, ragged-robin and blue water speedwell (both of which are County notable species). A single track, clear span bridge design will be used in order to reduce impacts on the stream, in

conformity with the Environment Agency and Water Vole Mitigation Handbook. With the above mitigation, the project would have no significant ecological effects.

- 2.11. The scheme also protects other ecological receptors on site including a hedgerow and mature trees. All of the above mitigation measures will safeguard other protected species, including roosting, commuting and foraging bats, reptiles, and nesting birds.
- 2.12. A CEMP and EMP will be produced to protect the ecological receptors during construction, and to provide guidance and long term management requirements of the grassland, SUDs and the stream corridor to protect the SINC designation

3.0 Conclusion

- 3.1. The proposed housing development has been designed to retain, protect and enhance key ecological receptors within the site, including retaining the stream within a 16m buffer, wildlife beneficial SuDS features, and an offline wildlife pond. These measures will create a net area of habitat for water voles, and will protect and allow further colonisation of the two notable plants recorded by the SWT, ragged-robin and blue water speedwell (both of which are County notable species). A single track, clear span bridge design will be used in order to reduce impacts on the stream, in conformity with the Environment Agency and Water Vole Mitigation Handbook. With the above mitigation, the project would have no significant ecological effects.
- 3.2. The scheme also protects other ecological receptors on site including a hedgerow and mature trees.
- 3.3. In conclusion, if left in current usage for horse grazing, both SNCI features risk future damage, and development with the proposed layout offers the best opportunity for the features to be retained, protected and the ecological value enhanced through future sympathetic management of the open spaces.

4.0 Addendum

ACD were instructed to undertake a Visual Impact Assessment, ecological survey, tree survey and prepare landscape proposals for a new housing scheme located at Little Flexford, Normandy, Guildford by Crownhall Estates in June 2014.

ACD has prepared a full suite of supporting information, including the ecology, arboriculture and visual assessment, all of which have informed the Landscape Masterplan, which includes all mitigation recommendations.

The proposed layout has been revised and developed to accommodate all the recommendations of the different environmental reports and will have no adverse impact on the SNCI features of the site.

This Environmental Statement concludes that, if left in current usage for horse grazing, both SNCI features risk future damage, and development with the proposed layout offers the best opportunity for the features to be retained, protected and the ecological value enhanced through future sympathetic management of the open spaces.

ACD provided the supporting information reports to SWT for their opinion and they reported as follows:

The proposed development of 25 dwellings would result in the loss of a high percentage of the neutral grassland, which in the remaining space available on site could not be fully mitigated, even with good conservation management of what little grassland remains.

The proposals for the site include no open spaces for play, recreation or pet exercise. We are concerned therefore that the likely anthropogenic disturbance and damage of the relatively small green spaces proposed for the site from the new residents, which would be required to support populations of rarer plant species, is likely to lead to degradation of plant communities despite the protection of an Ecological Management Plan.

The Water Vole 'corridor' is also likely to be subject to considerable disturbance despite fencing and information panels, as it runs through the centre of the proposed new housing.

The type of mitigation proposed includes good examples of their type but we remain concerned that they would not be sufficient on this site to maintain the biodiversity value of the SNCI, which would likely prove contrary to the biodiversity requirements of the NPPF, the NERC Act and Local Plan policy.

Despite years of possible overgrazing, this site still retains its SNCI value and the planning authority is likely to be seriously concerned about this factor when reviewing any development proposal.

ACD have since responded to the SWT review and noted that the SNIC assessment report concluded that the grassland interest is “*Unfavourable Declining*” and “*It is therefore likely that the continuing trend of increased coarse grasses and weedy plants will continue*”.

We questioned the grassland interest being sustained if it continues to be degraded by intensive grazing and suggested that if the continuing trend of coarse grasses and weedy plants continues, it is reasonably likely that the SNIC status will not be considered worthy of retention.

We argued that the only feasible way to halt the continuing decline (before irreversible damage occurs) is by instating appropriate management, secured in perpetuity by legal agreement. We also advised that the areas proposed for development were in fact the most degraded/heavily-grazed parts of the site and the most important features are being retained in the proposed layout.

We also suggested that, provided public access can be adequately controlled, the conservation benefits which could be gained by protecting the most valuable features of the site, would outweigh the loss of the least valuable parts of the site.

However, as a result of SWT’s further assessment of the site, the updated GBC Plan concludes that the SINC is “*still considered to be worthy of retention due to semi-improved grassland which is not compatible with development*”.

Site allocation A47: Land to the East of the Paddocks, Flexford

This site was allocated for 50 homes. Since the consultation, it has been resurveyed and is considered to still be worthy of a Site of Nature Conservation Interest (SNCI) status. This is due to the semi-improved grassland habitat which is not compatible with development. Given this habitat has declined dramatically across the country, it is still considered important and worthy of continued designation and protection.

During the July 2016 SNCI survey by SWT, the ecologist did not find any evidence of Water Voles and at the time concluded that the banks are not steep enough, with soft sediment and that the heavy vegetation renders the stream too shaded to support Water Voles. In addition SWT Water Vole surveys in 2016, both up and down stream, have not yielded any results.

Despite possible signs of Water Voles being noted during the ACD survey, we understand that recent SWT conclusions are that there is a 'likely functional water vole extinction' in Surrey, and this is reinforced by the Trust’s own findings on the site – note this was one of the reasons for the site’s original designation in 1995.

We concluded in our assessments that, the proposed layout had been revised and developed to accommodate all the recommendations of the different environmental reports and would have no adverse impact on the SNCI features of the site. The Environmental Statement included elements from the ecological, arboricultural and

landscape assessments, and demonstrated unequivocally that the development would **not** adversely impact the SNCI designation, but would retain and enhance the water-vole and grass features.

We note that A full National Vegetation Classification (NVC) survey was **not** carried out by SWT, however, they stated that where NVC communities were described, they were those that, in the surveyor's opinion, best fitted the habitats present at their site visit.

The Trust noted that, despite years of possible overgrazing, this site still retained its SNCI value and suggested that the planning authority was likely to be seriously concerned about this factor when reviewing any development proposal. However, the SNIC assessment report concluded that the grassland interest is "*Unfavourable Declining*" and "*It is therefore likely that the continuing trend of increased coarse grasses and weedy plants will continue*".

In response to ACD's Principal Ecologist's queries, Surrey Wildlife Trust responded as follows:

1. Does the Trust agree that the grassland interest will continue to be degraded by intensive grazing?

This is possible but not inevitable as intensity of grazing is important. The latest SWT survey should an improvement in SNCI quality over the previous one which is likely to have been the result of the then current grazing regime.

2. Am I correct in thinking that if the continuing trend of coarse grasses and weedy plants continues, it is reasonably likely that the SINC will not be considered worthy of retention?

This could happen if the management of the site is inappropriate. The latest SWT survey indicates that appropriate grazing of the site can restore SNCI value. The trend on site appears not to be "continuing" but responsive to differing regimes.

3. Does the Trust agree that the only feasible way to halt the continuing decline (before irreversible damage occurs) is by instating appropriate management, secured in perpetuity by legal agreement?

Sympathetic management of the site would help prevent the decline of SNCI status and a 'legal agreement' would not be the only feasible way to achieve this.

4. Is the Trust satisfied that the areas proposed for development are in fact the most degraded/heavily-grazed parts of the site and the most important features are being retained in the proposed layout?

It is a small site to start with and trying to select the best parts to protect is an unusual approach to the protection of its SNCI value. Reducing the site size in the adjacency of a development is likely to increase the pressure on the remaining parts of the site.

5. Does the Trust agree that provided public access can be adequately controlled, the conservation benefits which could be gained by protecting the most valuable features of the site, would outweigh the loss of the least valuable parts of the site?

We remain concerned that it would be difficult to deliver an adequate control of public access to the most valuable features of the site and the lack of additional public space would not help the situation. Your suggested approach is likely to lead to a net loss of biodiversity value.

Survey results have confirmed that the SNCI value of this site is still present and the 'risk' of development is likely to adversely affect SNCI value and lead to a loss of biodiversity value, which would be contrary to the Local Authority's biodiversity responsibility under NERC and the NPPF.

In conclusion, I would emphasise that the land is privately owned, with no outside control over the level of grazing within the site or its management. SWT accept that without appropriate management the continuing trend of coarse grasses and weedy plants could threaten the SNCI status. There is currently no management, and if an application is unsuccessful, this lack of management would continue with the level of grazing likely to increase, potentially putting more pressure on the grassland. A legal agreement may not be the only way to halt the decline, but sympathetic management would help, which can be achieved through legal agreement and detailed in the Landscape and Environmental Management Plan.

The 'years of possible overgrazing' are actually uncontrolled grazing that will continue and the remnant grasses survive despite the grazing, and not because of it.

The unfavourable decline of the grasses and the 'likely functional water vole extinction' in Surrey does not justify the SNCI designation of this site, nor does its current usage serve to preserve or enhance its environmental value.

The proposed development has been designed to preserve and enhance a stream corridor through the site, that would allow the movement and establishment of Water Voles should that be possible. It also allows for areas of open space that can be protected

and subject to a Landscape and Ecological Management Plan, protecting and, if need be, excluding areas of grassland, to allow for the retention and future development of the grassland habitats.

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