

Written statement on Supplementary Questions (6/5/20) on behalf of:

Barton in Fabis Parish Council, Clifton Village Residents Association, Lark Hill Retirement Village Residents, Thrumpton Parish Meeting and SAVE Campaign Group

Matter 5 –Site Allocation Development Briefs

MP2p – Mill Hill near Barton-in-Fabis

Question 56: Should the Brief require assessment in accordance with national policy on Green Belt, including measures to mitigate any effects on the Green Belt?

We believe (see responses to Questions 38 and 39) that the impacts on the Green Belt by this proposal cannot be mitigated. However, if it is allocated then measures to mitigate some effects should be included.

Question 57: Should a requirement for assessment of effects on the Trent Valley Green Infrastructure Corridor be included?

- 57.1. We believe that there should be a requirement for assessment of effects on the Trent Valley Green Infrastructure Corridor be included for the assessment of this site.
- 57.2. The analysis made for the Revised Minerals Plan overlooks the significance of the extraction site as an ecological corridor and part of the wider supporting green infrastructure for the nationally important Attenborough Nature Reserve.
- 57.3. In our response to the planning application the Parish Council have shown that the habitat in the area of the proposed site is also vital for many of the species present on the River Trent and at Attenborough Nature Reserve, and that ornithological evidence suggests that the site complements the latter. The importance of the floodplain and its associated habitats are highlighted in the Nottinghamshire Local Biodiversity Action Plan under the Habitat Action Plan for Rivers and Streams, which stresses the importance of lowland wet grassland, a habitat type that covers much of the site.
- 57.4. The current plan therefore fails to take the significance of the site at the landscape scale into account. It underestimates the damage that the development would have on integrity of the ecological network in this part of the county and the concomitant impact on the populations of priority species and priority habitats¹. Paragraph 174b of the NPPF states that planning policies should seek to preserve ecological networks as well as restoring and recreating them. While restoration measures are proposed, the damage to an existing functional ecological network is overlooked. The County have a duty to identify and pursue opportunities for securing measurable net gains for biodiversity and so must make a proper assessment of the effects of proposed development and restoration at this site on Trent Valley Green Infrastructure Corridor.
- 57.5. Given the proximity of the proposed site to East Midlands Airport, part of the analysis of the impacts of the current planning application have concerned bird management. The need would

¹ In their response to consultation on the 2014 Mineral Plan, English Nature confirm the importance of the wildlife sites within the area of the proposal in relation to the wider ecological network; letter to NCC dated 8/7/2014.

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arise both during the operational phase and post restoration because of the large areas of open water that would be created. The need to reduce and manage bird numbers conflicts with the claimed ecological benefits of restoration at the site and the impact of measures on the reserve at Attenborough have not been assessed.

- 57.6. In addition to the ecological contribution of the site as part of the Trent Valley's Green Infrastructure its role as a recreational resource also needs to be assessed. Only the River Trent separates the site from Attenborough Nature Reserve which many people visit throughout the year. The RSPB publication *Bigger and Better*² estimate that 600,000 people visit Attenborough Nature Reserve annually. Those who walk Attenborough's riverside paths will continually view the adverse effects of the site over the lengthy operational period and will no longer be able to enjoy the peace and tranquillity of the reserve.
- 57.7. The importance of the views of the site across from Attenborough are in fact confirmed by the ecological assessment made by the proposers as part of the planning application (see Para 5.73 of the Ecological Assessment) which states "the Application Site can be seen from Attenborough Nature Reserve and SSSI on the adjacent side of the River Trent to the west. Numerous footpaths and cycle routes are present within Attenborough Nature Reserve that offer views across the Application Site of an English countryside". The screening by tree planting proposed as a mitigation measure by the developers would cut-off this view. If no screening were established then the view would be lost anyway by virtue of the plant and excavations.

Question 58: Should a requirement for assessment of impact on the Attenborough Nature Reserve be included?

- 58.1. We believe that there should a requirement for assessment of impact on both the Attenborough Nature Reserve and the Holme Pit SSSI to be included in the development Brief.
- 58.2. In the context of Attenborough, we have shown in evidence provided to the NCC that the site makes an important contribution to the ecological richness, resilience and integrity of the Attenborough Nature Reserve, whose boundary is within 100m of the proposed extraction site. The ecological impact assessment made in the context of the planning application for this site acknowledges (para 7.11) that 'the Attenborough Gravel Pits SSSI may be subject to disturbance from noise, dust and lighting'. However, the analysis is deficient in that does not examine the likely impacts of noise on the sensitive species breeding and overwintering in the SSSI nor does it provide data on the baseline level to be able to evaluate the change in noise levels that would be experienced either by wildlife (or visitors) along this boundary of the SSSI. The additional material provided under the Regulation 25 procedures (again in relation to the planning application) also fails to establish what the impact on the Attenborough Nature Reserve will be. Whilst these are criticisms of the planning application, they need raising in the context of what any development brief should identify for consideration.
- 58.3. A specific assessment of noise and vibration, light and dust impacts on birds (specifically Schedule 1 species, and red and amber list Birds of Conservation Concern) should be provided both for the proposed site and Attenborough.

² https://www.rspb.org.uk/Images/biggerandbetter_tcm9-401346.pdf

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- 58.4. Holme Pits is a SSSI within 160m of the northern boundary of the proposed site. It is also likely to be impacted by the development, and these effects also need to be included in the analysis.
- 58.5. Although it is outside the boundary of the proposed development Holme Pit is a water dependent feature sensitive to changes in the quality and quantity of water draining from the proposed site. The hydrological mitigation and restoration plans suggested as part of the planning application fail to protect the SSSI from off-site impacts because:
- 58.5.1. No data are provided for the current hydrological regime of Holme Pit or the contribution that Barton Pond and Drain makes to this site, and so information is insufficient to establish a base-line against which impacts on water quantity could be judged or restoration targets set.
 - 58.5.2. Proposals provide no detail on how water quality (phosphorus) entering Barton Pond and Drain and eventually reaching Holme Pit would be managed.
 - 58.5.3. Proposals fail to acknowledge that the Holme Pit SSSI is especially sensitive because it not only receives discharges from Barton Pond and Drain, but also a number of other surface water courses draining from the proposed site. These include the Eastern Drain and other associated/neighbouring drainage channels. If discharges into Holme Pit are to be adequately managed then again appropriate base-line assessment and monitoring protocols would need to be provided.
 - 58.5.4. The potential hydrological impact on the Eastern Drain and other water courses that drain from Brandshill Grassland is especially important to assess because in the proposals the area at the north-east corner of the development, at the foot of the escarpment, is earmarked for the location of a 'stockpile'. As part of the evaluation of the planning proposal it is noted that such a stock pile would be impacted by flood events and this would result in significant amounts of sediment being transported to Holme Pit. The management of the stockpile in relation to flood events has not been resolved, and concerns not only the potential effects of major floods, but also more frequent but lower intensity events.
- 58.6. The impacts of the development on Attenborough Nature Reserve and Holme Pit SSSI need to be fully taken into account because without the inclusion of the offsite impacts any calculation of biodiversity net gain (see our response to Question 31) is not possible.