

Date: 30 March 2022
Our ref: 387339
Your ref: TR010056



National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN



BY EMAIL ONLY

Dear Sirs,

NSIP: A417 Missing link
User Code: TR010056
Answers to Examining Authorities Further Written Questions 17 March 2022

Natural England's position statement on recreational pressure on Crickley Hill and Barrow Wake Site of Special Scientific Interest

2.3 Biodiversity, Ecology and Natural Environment (including Habitats Regulations Assessment (HRA))

2.3.6. GWT, Natural England, National Trust, Joint Councils

Position statement. Produce a detailed position statement setting out the respective positions regarding the potential effects of increased recreational pressure upon the Crickley Hill and Barrow Wake units of SSSI. Each party's views on the likelihood of increased recreational pressure and the areas this would be experienced should be clear, alongside views on potential mitigations setting out areas of agreement and disagreement accordingly. Include, where necessary, references to the NPSNN and any disputes with the Applicant's position set out at Deadline 5 [REP5-008]. Since this is an 'operation effect' please confirm what, if any, concerns remain about construction effects either as a separate statement or chapter in your response.

Crickley Hill and Barrow Wake Site of Special Scientific Interest (SSSI) is a mixed biological and geological site that supports a range of habitats characteristic of the Cotswold limestone, including species rich grassland, scrub and semi-natural woodland, together with nationally important rock exposures. The site is dissected by the existing A417, with the Crickley Hill portion to the north and the Barrow Wake portion to the south.

Both the Crickley Hill and Barrow Wake portions of the SSSI are open to the public, being open access land and crossed by numerous Public Rights of Way including the Cotswold Way National Trail. In addition, the Crickley Hill portion of the site is a Country Park, promoted to the public and owned and managed by the National Trust and Gloucestershire Wildlife Trust. Gloucestershire Wildlife Trust also manages the Barrow Wake portion of the site. A map is provided in Appendix 1.

Natural England has a dual role which includes the promotion of access as well as protecting biodiversity. Whilst we very much support the improved public access to nature as a result of the proposals, we are not satisfied that the proposals would not result in recreational impacts on Crickley Hill and Barrow Wake SSSI.

Our concerns regarding the impacts of recreational pressure on the SSSI are:

- Increased footfall causing trampling of SSSI vegetation and soil erosion.
- Increased illegal behaviours such as littering.
- Impact of the above on grazing the site, which is necessary for its favourable condition.

Gloucestershire Wildlife Trust and the National Trust have written:

As site owners and managers, Gloucestershire Wildlife Trust and the National Trust have extensive first hand experience of managing the Crickley Hill and Barrow Wake SSSI. No-one else has greater knowledge of balancing stewardship of the cited biodiversity features alongside managing access for people at these sites. We have jointly presented evidence to support our concerns regarding increased recreational pressure, which includes both empirical data and our considerable on-the-ground knowledge. The Crickley Hill and Barrow Wake SSSI is a nationally important biodiversity site, which forms an important core area of the Gloucestershire Nature Recovery Network. We strongly encourage use of the precautionary principle in matters relating to the SSSI because the consequences of underestimating the impact of recreational pressure are very significant.

Natural England agrees with this statement and will not duplicate the expert advice that Gloucestershire Wildlife Trust and the National Trust are providing. We have additional advice in relation to mitigation.

Paragraph 8.10.228 of Environmental Statement Chapter 8 – Biodiversity acknowledges that the viewpoint close to the car park will be a particular draw for visitors walking the Air Balloon Way, and that the grassland habitat in closer proximity to this location is more likely to be impacted by increased visitor numbers. The ES states that:

“segregated routes, signage and other measures to deter public access from sensitive features would be discussed and agreed at detailed design stage, to help reduce and avoid adverse impacts on SSSI habitats that could arise from additional visitors attracted to the viewpoint and immediate surrounds”.

Natural England advises that it would not be possible to restrict access or declare areas as ‘out of bounds’ as this area is open access common land. Restrictions would not be legal unless there were a formal access restriction under the Countryside and Rights of Way Act 2000. It would be possible to utilise well-designed visitor information and sympathetic signing that asks people to respect the site, for example requesting visitors use certain routes at certain times of year or directing people to more roust areas. However, Gloucestershire Wildlife Trust and the National Trust have expressed reservations about the likely effectiveness of such methods, which we share.

Natural England has previously stated that we wish to see the closure of the Barrow Wake car park, as a way of avoiding increases in recreational pressure. Barrow Wake is considered to be particularly at-risk due to its high appeal as a view point destination coupled with the sensitive habitat types and species. We anticipate the use of the Barrow Wake car park increasing as a result of the scheme, due to the proximity and ease of access to the ‘Air Balloon Way’ with its appeal for walking and cycling and improved accessibility into Crickley Hill Country Park via the bridge. While we very much support the improved access to nature, we would ideally want parking at locations other than Barrow Wake, as a means of dissipating visitor pressures. Decisions around the Barrow Wake car park should be set in the context of a wider conversation around the recreational use of this area.

If you have any queries relating to the advice in this letter please contact me on

[REDACTED]

Yours faithfully

[REDACTED]

Hayley Fleming
Senior adviser – Planning for a Better Environment
West Midlands Area Team