



**Gloucestershire**  
Wildlife Trust

**Gloucestershire Wildlife Trust  
Position statement on  
recreational pressure on the  
Crickley Hill and Barrow Wake SSSI resulting  
from the A417 'Missing Link' Road scheme.**

Case reference: TR010056

Interested party number: 200028970

Document reference: GWT TR010056 SSSI pressure position statement D6.

## **1. ExA Question 2.3.6**

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.

## **2. Potential effects of increased recreational pressure upon the Crickley Hill and Barrow Wake units of SSSI**

The SSSI has been notified since 1974 and the ecological elements of the citation relate to species-rich Cotswold limestone grassland, scrub and semi-natural woodland. These broad habitat types and the notable species they support are sensitive to increased recreational pressure. The risk are outlined below.

### **2.1. Threats to lowland calcareous grassland on Cotswold limestone**

- 2.1.1. The SSSI supports several sub-types of this grassland, which is nationally scarce and threatened. In the 1930's this grassland covered 40% of the Cotswolds but has declined to less than 1.5% today, which still represents over half of the UK's remaining area of this habitat.
- 2.1.2. The grassland contains high botanical diversity and supports a large diversity and abundance of invertebrates. This includes source populations for many national priority and threatened species.
- 2.1.3. The most recent grassland survey of the SSSI by Natural England found part of it to be in 'unfavourable recovering' condition. This assessment highlighted that areas of longstanding heavy public use had lost their special interest.
- 2.1.4. Gloucestershire Wildlife Trust's (GWT's) written representation ([document link](#)) included survey maps demonstrating the impact of erosion and compaction from visitor pressure on vegetation structure and diversity across the SSSI.
- 2.1.5. Recreational pressure, whether through footfall, horse-riding or mountain biking causes compaction of the soil, which results in a loss of the notified grassland communities and habitat for the associated invertebrate assemblages.
- 2.1.6. Mountain biking is a key issue in the nearby SAC and increasingly at Barrow Wake. The most appealing areas for mountain biking are steep slopes, which contain some of the most diverse and sensitive habitat in the SSSI.
- 2.1.7. Many visitors are dog walkers and research demonstrates that this adversely

impacts grassland condition by significantly increasing soil nutrients [1], reduces insect diversity and increases the risk of biological invasions [2].

2.1.8. An increase in visitor pressure would increase the magnitude of all of the impacts listed above. This could lead to further degradation and loss of notified grassland and invertebrate communities. The grassland units of the SSSI are particularly at risk because they are adjacent or close to the visitor facilities and viewpoints at both Crickley Hill and Barrow Wake.

2.1.9. Natural England has highlighted under grazing as a threat to condition. Increases in visitor numbers can create challenges for conservation grazing due to issues such as dog attacks and dog mess. If this did become a barrier to grazing the long-term management and maintenance of the SSSI would be threatened.

## **2.2. Threats to lowland mixed deciduous/beech-yew woodland**

2.2.1. Two woodland areas are included in the SSSI notification: Short Wood (on the plateau in the north of the site) and The Scrubbs (located north of the proposed Cotswolds Way crossing). The woodland citation includes ancient beech pollards and scarce beetles associated with deadwood. The woodlands also support red-data book fungi.

2.2.2. The last Natural England condition assessment in 2011 noted the adverse impact of visitor trampling on the rich ground flora associated with the woodland areas. Compaction also damages the root plates of trees, restricting their development and making them less resilient to extreme weather events.

2.2.3. GWT is aware that the National Trust (NT) has demonstrated the impact of visitor pressure on woodland condition at Crickley Hill through visitor exclusion trials in Short Wood. As a result, the woodland ground flora, tree health and decay wood features are now considered to be in favourable condition.

2.2.4. The SSSI citation also includes bird assemblages. It is well documented that breeding birds can be adversely affected by disturbance, particularly from dogs. Bird assemblages can also suffer longer-term indirect impacts if visitor pressure reduces the availability of nesting habitat.

## **3. Likelihood of increased recreational pressure**

3.1. GWT and the National Trust jointly manage the SSSI and have extensive practical experience of managing recreational pressure in the area. GWT's view is that no organisations are better placed to assess the likely impacts. It is therefore, disappointing that National Highway's position does not reflect our aligned assessment of this matter.

3.2. GWT concurs with the NT on the three key reasons that we believe that recreational pressure is likely to increase

a) Increased visitor numbers

- The DCO documents acknowledge that visitor numbers to the Crickley Hill and Barrow Wake SSSI are likely to increase as a result of the scheme (Environmental Statement 8.10.212; 8.10. 228) and that the impact of increased recreational pressure would be permanent (Environmental Statement 8.10.231).
- The significant safety improvements to the Cotswold Way crossing at the Air Balloon Roundabout will inevitably increase recreational use of the Crickley Hill and Barrow Wake SSSI. There is evidence that 75% of visitors to Barrow Wake would use the new Cotswold Way crossing to access Crickley Hill (GWT written representation 2.10.2).
- There is evidence of demand for biking and horse-riding use on the SSSI (GWT written representation 2.10.3). Mountain biking is increasingly an issue at Barrow Wake, but there is currently little activity at Crickley Hill. An increase would be facilitated by the improved Cotswold Way crossing.
- The Air Balloon Way is aiming to draw more visitors to the area, many of whom would want to access the views and facilities at the SSSI.
- The scheme will reduce journey times from Cheltenham and Gloucester, making visits to the SSSI more convenient.

b) Destination locations

Crickley Hill and Barrow Wake are destinations because of the views, facilities and semi-natural habitats they offer. As the scheme stands, this will not be replicated by the Air Balloon Way or anywhere else in the area. Therefore, most additional visitors will end up at using these sites.

c) Efficacy of proposed mitigation

Based on GWT's extensive experience of managing visitor pressure, the mitigation to increased connectivity proposed under 2.15.6 of Document 8.11 will be insufficient to achieve the residual impact stated by the assessment. This is because

- Signage has very limited efficacy in managing recreational pressure at biodiversity sites. It is practically impossible to restrict visitor use to way-marked routes, as demonstrated by the large number of existing desire lines across the sites.
- Sufficient evidence has not been provided to support the claim that the much safer Cotswold Way crossing will not increase user activity on the SSSI.
- Mitigation revisions to the network are largely on sections that do little to reduce biodiversity impacts or represent backtracking on routes added after

the initial proposals which were removed following concerns expressed by GWT and other environmental stakeholders.

- Car parking at the Golden Heart Inn is too far from the Crickley Hill and Barrow Wake SSSI and doesn't offer equivalent views, so it will not have any meaningful impact on redistributing people.
- It would be logistically impossible to prevent mountain bikers using the improved access to Crickley Hill to access sloped areas away from the formal bridleway.

#### **4. Impacts on landowners (National Trust and GWT)**

- 4.1. As outlined above, we believe there is likely to be an increase in recreational pressure on the SSSI. Without additional mitigation this will result in an increased management burden for the SSSI owners, GWT and NT.
- 4.2. This will include resource and capital costs to manage visitor access and resulting impacts, increased H&S tree management costs and compaction and erosion damage on the hillfort.
- 4.3. It is unclear what the legal responsibility of National Highways would be if the effects of the scheme necessitates GWT and the NT to find additional resources to fulfill their legal duties to manage the SSSI.
- 4.4. There is currently no recognition of these impacts by the Applicant, nor any provision to resolve them. As these impacts will be a direct result of the scheme, we believe the Applicant has a responsibility to reduce them through additional mitigation.

#### **5. Potential mitigation**

- 5.1. As an absolute minimum the recreational activity levels and its effects on the SSSI must be monitored during operation, otherwise there is no assurance that significant adverse impacts on biodiversity will be avoided.
- 5.2. GWT reiterates the request made at ExQ1, calling for a Strategic Access Management & Monitoring Plan to mitigate and monitor the impact of increased recreational pressure at the Crickley Hill and Barrow Wake SSSI. This could be part of a wider landscape-wide strategy for the SSSI and SAC delivered alongside other schemes.
- 5.3. GWT maintains the view (Statutory consultations in 2019 & 2020, written representation 2021, ExA Q1 – 3.18.3) that alternative natural green space provision is required to sufficiently mitigate increased recreational pressure on designated biodiversity sites resulting from the scheme.
- 5.4. In 2018, GWT excluded visitors from a small area of grassland that had been heavily compacted and eroded using fencing. Calcaerous grassland with this area has since

regenerated demonstrating adverse impact of visitor pressure. We are aware that the NT successfully implemented a similar approach in an area of Short Wood. Although visitor exclusion areas are effective at protecting biodiversity features, they are not desirable because they exclude people from nature and are difficult to implement due to the constraints such as the Scheduled Ancient Monument, Open Access Land and Registered Common land. Fencing also hinders grazing provision on the SSSI and it is not always possible to install on hard bedrock.

## **6. Disputes with the Applicants position**

GWT has two main areas of disagreement, which align with those of the NT.

1. The Applicant's conclusion of a slight adverse effect, which is not significant. Based on our reasoning above, we believe the impact to be adverse, moderate to major and nationally significant.
2. The proposed mitigation is inadequate. There is insufficient evidence that the stated residual levels of impacts on the SSSI are achievable. As outlined above, additional mitigation is required to reduce the residual effects.

## **7. Statement on Construction effects**

GWT is confident that outstanding concerns regarding construction effects can be resolved at detailed design by the Construction Management Plan (CMP) document.

## **8. Joint summary statement with the National Trust**

As site owners and managers, Gloucestershire Wildlife Trust and the National Trust have extensive firsthand 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.

## **References**

- [1] P. De Frenne, M. Cougnon, G. P. J. Janssens, and P. Vangansbeke, "Nutrient fertilization by dogs in peri-urban ecosystems," *Ecol. Solut. Evid.*, vol. 3, no. 1, pp. 1–9, 2022.
- [2] S. Buchholz, B. Seitz, A. Hiller, M. von der Lippe, and I. Kowarik, "Impacts of dogs on urban grassland ecosystems," *Landsc. Urban Plan.*, vol. 215, p. 104201, 2021.