

## **Text for M54-M6 Link representation**

### **NET BIODIVERSITY GAIN**

There is no table summarising the value, impact significance and mitigation for each ecological receptor and the residual impacts from construction and operation. We request this is provided for clarity, and all residual impacts are mitigated to achieve overall net gain.

The results of the biodiversity metric calculations currently show a combined net loss of 61.89 biodiversity units. This is considered in the EIA to be no net loss. We do not agree- this is a large net loss which needs to be mitigated fully, to provide an overall net gain in line with the current NPPF and 25 year Environment Plan.

The result is surprising given that significant areas of new diverse habitats are proposed. Defra Metric 2.0 has not been used to calculate the biodiversity impact. We consider this to be the most accurate method currently available, as it reflects more detailed impacts and includes connectivity. The assessment does not appear to include restoration of retained habitats. This could contribute a significant number of units in a shorter time than habitat creation from scratch. Avoiding the small direct impact on ancient woodland would also mean more habitat creation could be counted.

We recommend the Defra metric 2.0 is used to re-calculate the figures, restoration of retained habitats is included, and any deficit of units resulting is mitigated off-site via agreements with landowners. Off-site mitigation should prioritise habitat restoration of existing ancient woodland or LWS and habitat creation that expands or links existing habitats.

### **Outline Environmental Management Plan**

This looks to cover most aspects- a detailed management plan will be needed.

### **DESIGNATED WILDLIFE SITES**

#### **Local Wildlife Sites (LWS)**

##### **Lower Pool SBI**

Has been assessed as no longer meeting LWS criteria, however is stated as being of county value. The scheme would result in direct permanent loss of 1.83 ha of woodland and 0.55 ha of standing water which is 37.7 % of the SBI

Mitigation of 25.13 ha of new woodland, 0.7 ha of standing water and 1.04 ha of wet and species rich grassland, with improved habitat connectivity. This appears adequate, although no restoration of the retained SBI areas is mentioned- this should be included.

##### **Brookfield Farm (north-east of), Shareshill SBI**

The site was assessed as still meeting the SBI criteria, and part has been assessed as ancient. There would be a loss of 0.75 ha of woodland, 15% of the SBI, and temporary impacts to the Latherford Brook (Watercourse 5). Mitigation includes new woodland habitat around the SBI (see ancient woodland comments below) and 0.39 ha of new pools to the south, with habitat links along new embankments. This appears adequate, although no restoration of the retained SBI areas is mentioned- this should be included.

### **Potential Local Wildlife Sites**

We welcome use of the Staffordshire LWS criteria to assess some habitats such as hedgerows, However as assessments were undertaken in July 2019, this is likely to have underestimated the value of hedgerow and woodland ground flora.

We are concerned that not all high value habitats as listed in Appendix 8.4 Designated Sites and Habitats appear to have been assessed adequately against the criteria; many are considered county or local value. No raw data for the Phase 2 / NVC surveys or LWS assessments is provided.

Several woodlands and some important species-rich intact hedgerows would warrant re-assessment at the correct time of year. The swamp at TN49 has not been assessed, despite it supporting nine grassland scoring species. Although of small size it is adjacent other habitats that should be assessed together.

### **HABITATS**

Figure 8.3 Phase I Baseline Habitat Survey does not show habitat survey data for the area.

### **Ancient woodland and Veteran Trees**

Within Brookfields Farm SBI – 0.0015 ha direct loss; 0.04ha assumed loss due to incursion into the 15 m buffer zone and a further 0.078 ha assumed lost as a result of the change in air quality. Provision of 3.08 ha of broad-leaved plantation (7:1 ratio) has been agreed with Natural England. Direct losses should be avoided by amending the road embankment to a retaining wall adjacent the site. Will any soil translocation occur? Woodland creation should include addition of dead wood and ground flora sowing from local sources.

Oxden Leasow (Whitgreaves Wood) adjacent the M54 – This warrants SBI designation. No direct loss would occur and habitat improvement is proposed. Detailed management should be agreed with stakeholders.

We are concerned that areas of potential ancient woodland may have been missed. There is a remnant of Oxden Leasow/ Whitgreaves Wood on the north side of the M54 which has not been investigated. Areas of 'The Belt' woodland adjacent to the A460 could possibly be ancient, as they appear on old maps and support some indicator species such as bluebell, dog's mercury and wood melick.

No veteran trees will be directly affected by the Scheme.

### **Other irreplaceable habitats**

The EIA does not appear to have assessed whether any other habitats, such as important and species-rich hedgerows, may be ancient and meet the definition of irreplaceable habitats. This should be assessed, as any such habitat will need bespoke mitigation.

### **Priority Habitats**

Swamp habitat- TN49 is a diverse swamp habitat supporting a diversity of wetland plants; there is no specific mitigation proposed. This habitat would translocate well and could be used to establish other wetlands on the site.

Grasslands- no species-rich grassland would be impacted. We request that new species-rich grassland is created with seed or hay from local diverse meadows, not a seed mix, so that these areas are able to reach LWS quality in future.

Hedgerows- There would be a net gain of 1.36km of hedgerow. However there is no mention of translocating any important or species-rich hedges- this should be considered as translocation provides faster establishment, reducing temporal effects and gaining biodiversity units.

Semi-natural woodland- There would be a loss of 1.18 ha, although overall a net gain of 4.59 ha of non-ancient woodland types. New planting should emulate existing LWS woodlands and include topsoil inversion and ground flora establishment.

Ponds and watercourses –a net gain is proposed in ponds and watercourse length which is welcomed.

### **Nitrogen deposition**

Given that the scheme will increase local NO<sub>x</sub> deposition upon receptors that are already beyond their critical load, the scheme should contribute to the management of sensitive sites such as ancient woodlands nearby to off-set this impact.

### **SPECIES**

We welcome the assessment of species populations against the Staffordshire LWS criteria. Where populations have been assessed to be of county importance, including Noctule, Myotis sp and Soprano pipistrelle bats, otter and watervole and GCN metapopulations, we request that Highways England works with the Staffordshire Wildlife Sites partnership to further investigate the need for designation.

## **Birds**

There would be a direct loss of breeding territories of notable bird species during construction: one dunnock, five skylark, two song thrush and one lapwing. While new habitats would eventually mitigate for this, no short term mitigation is provided. A temporary off-site mitigation area should be provided particularly for ground nesting species. Hedgerow translocation and use of brash pile/ dead hedges as temporary nesting features would also reduce short-term impacts to nesting birds.

Barn owl are at risk from vehicle collisions, although scheme design has sought to minimise this- monitoring of bird fatalities should be undertaken and if barn owl casualties are found, measures should be taken to compensate via provision of habitat and nest sites in safe areas away from the scheme

## **Otter and water vole**

Presence has been confirmed within the Latherford Brook. Water vole should not be considered common in Staffordshire- they are potentially facing extinction. Therefore any watervole population may merit regional importance. Watervole evidence and otter resting sites are unaffected by the brook crossing, and adequate monitoring and habitat enhancement is proposed.