


From: [Paul Griffiths](#)
To: [Scales, Carol \(NE\);](#)
Subject: Re Sound Common SSSI for Dr Tim Hills attention
Date: 28 August 2012 11:17:13


26/8/12

Dear Dr Tim Hill

Re Sound Common SSSI

As a Parish Councillor, co-author of the Parish Management Plan, and local resident with fifty years knowledge of this site I wish to express, at the highest level, my concern with what I understand to be the sites proposed management.

A summary of the sites recent history

All 'authorities' except the Parish Council claim the site is degraded heathland and that management should be one of heathland restoration. The Parish Council view is that the site is a wet woodland composite which includes three tiny heathland fragments. These differing views and conflicting arguments were detailed in two management plans, one for Crewe and Nantwich Borough Council 1995 and one for the Parish Council 1996. At that time, against the wishes of the Parish Council a Countryside Stewardship Agreement was signed with the Countryside Commission on the basis that the entire site was heathland. Subsequently and without explanation, Crewe and Nantwich did not implement the agreement undertaking minimal management. Consequently the local residents group, with guidance from Natural England and its predecessors, undertook management aimed at preventing woodland encroachment and maintaining the sites 1996 status.

In 2011 Cheshire East Council, the Crewe and Nantwich successor, took over the role of the sites 'protector', the site is a registered common without an owner. In conjunction with Natural England they produced a 'management plan' for the next five years. This plan was formulated without Parish input and the issues raised in 1995/6 about the sites actual structure do not appear to have been considered. This is compounded by misrepresentation of the sites history with Neil Clark of Natural England claiming that the site was 'the finest example of wet lowland heath in Cheshire at the time of re-notification in 1994' and Cheshire East that the work carried out by residents has not prevented succession of the heathland to woodland. No evidence has been given for either of these claims and that which is available contradicts them.

My specific concerns.

The failure to follow standard guidelines in the formulation of the plans renders them unscientific. The sketches provided show ditch infill, turf stripping and woodland removal but are devoid of detail and its extent is undefined. This combined with the prevention of effective Parish input during preparation, renders interpretation difficult and rational comment is precluded.

A site meeting, 7/5/12, ostensibly to clarify the issues, appeared to be structured to suppress alternative views and provided no detail of what is intended or methodology.

There is no evidence of survey or evaluation prior to the plans production. The result is an incorrect assumption, unsubstantiated by any evidence and contradicted by available records, that the sites value resides solely in its heathland fragments and these have been degrading since 1994.

The sites rarest species are not mentioned and there is no indication that they or constructive management has been considered. In fact management already implemented and supported by Cheshire East and Natural England contradicts the recommendations of Pond Action for the conservation of the rare aquatic invertebrates and gave no consideration to the preservation of deadwood on the site.

In concentrating on the sites heathland fragments it appears that the ecological relationships within this wet woodland composite have been ignored.

There is no evidence of any consideration of damaging effects on resident species or indication of how these might be mitigated or even that they would be monitored. Since Parish criticism limited survey has been commenced but it does not include the sites most important groups and no indication has been given of when and how the plans might be modified.

No indication, other than increased area of heathland, as to possible site benefits resulting from the proposals. The site currently has few heathland specialists and its inherent structure, size and fragmentation make it highly unlikely that even if the whole area could be converted to heathland these would increase. Many important species would however be destroyed.

I would hope that you agree site management plans should be evidence based and scientific following standard guidelines. Also that local Parishioners should be included during formulation to enable effective input.

Yours Faithfully

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