

Sharon Craig

From: Derek Richardson <derek.richardson@tameside.gov.uk>
Sent: 12 December 2019 16:48
To: planning
Subject: Re Application 3/2019/0981 - EIA Scoping Request for the Haweswater Aqueduct Project - GM Ecology Unit response

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Dear Sir/ Madam

Thank you for consulting the Ecology Unit on the Environmental Impact Assessment (EIA) Scoping Opinion on the proposed Bowland section of the Haweswater Aqueduct Resilience Programme (HARP)

I have reviewed chapter 9 of the EIA Scoping Report and in general I am satisfied that the Scope for the Assessment of the current biodiversity value of the sites and areas affected is comprehensive. I would offer no recommendations for any additional survey work than that already undertaken or proposed (it is noted that some proposed surveys have yet to be completed), although I would comment that some of the stated distances around sites within which surveys will be undertaken – 50m - may in some cases be a bit restrictive and may need to be re-assessed depending on the potential presence of certain protected species.

It is unclear whether the ecology survey reports have been used to determine working areas so as to avoid impacts as far as possible, in line with the requirements for EIA. If this is the case it should be stated, or if not then reasons should be explained.

The need to undertake an Assessment of the proposals under the terms of the EU Habitats Regulations because of the proximity of parts of the scheme to European designated nature conservation sites has been identified. The applicant should note that sufficient survey information will be required to inform the HRA, including an assessment of whether land within the identified 'development envelopes' will act as functionally linked land. It is recognised that wintering bird surveys are planned during the winter of 2019/20 to better inform an HRA.

The need to undertake further surveys and assessments of potential impacts of the scheme on Local Wildlife Sites (BHS sites) has also been identified. Impacts on BHS sites should be avoided.

I would comment that the scheme is proposed as a 'Design and Build' concept. This may make it difficult going forward to accurately Assess the detailed impacts of some elements of the scheme until quite late in the design phase, possibly after planning applications have been determined. For this reason I would recommend that suitably qualified ecologists are retained by the applicant through all of the planning and implementation stages of the scheme to provide on-going detailed advice on impacts and required mitigation and compensation measures for any identified impacts on biodiversity interests. The applicant should wherever possible avoid using 'indicative' areas for works and instead should provide information concerning the certainty of impacts, for the avoidance of doubt.

I note that the overall HARP scheme has very long implementation timescales. Impacts on nature conservation interests at construction compounds and access routes may not therefore be able to be regarded as 'temporary' impacts which can be addressed by land restoration and landscaping post-completion. Wildlife displaced or disturbed by construction activities may not return if these impacts are very prolonged. Instead, compensation for these 'temporary' impacts may need to be provided before works are complete, or even before works commence.

I welcome the mention in the Scoping Report of the need for the scheme to avoid 'no net biodiversity loss' and to achieve biodiversity net gain where possible. To this end, and where appropriate, the application of a Biodiversity Metric to measure gains and losses should be considered.

Yours sincerely
Derek Richardson

Derek Richardson
Principal Ecologist
Strategic Infrastructure
Development and Investment
Growth

[Tameside MBC](#) | [Twitter](#) | [Facebook](#) | [Instagram](#)
Dukinfield Town Hall | King Street | Dukinfield | Tameside | SK16 4LA

Tel. 0161 342 2593
Mobile. 07709 394502

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