

**Extended Preliminary Ecological Assessment
for a car park development at
St Cecilia's High School,
Longridge
Ribble Valley Borough
Lancashire**

By

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1 INTRODUCTION

1.1 Small areas of improved amenity grassland, ornamental shrubbery and mature amenity trees at Cecilia's High School, Longridge in the Ribble Valley Borough of Lancashire (SD 6022 3663), were assessed to the CIEEM Guidelines for Preliminary Ecological Appraisals Second Edition 2017 and for Biodiversity Net Gain (BNG) by Dave Bentley Entomology and Ecology Services on 18th October 2024. There is a planning application to extend the car parking at the High School. Most of the site was previously cleared and stoned as a temporary working area for other building works at the school but BNG requirements require that the BNG assessment is based on the pre-clearance habitat. Additionally all schools in the education authority area had been required to undertake a tree safety report with resultant works, and the opportunity was taken to include the removal of trees impacting the development of car parking spaces at the same time. Thus for BNG assessment the Arborist's report has been consulted. The original habitat can be seen on Google Streetview.

1.2 The car park site consisted, at the qualifying assessment period, of:

NW car park plot: Perennial Rye-grass dominated grassland of 72 square metres (g4 Modified Grassland) and a concrete bike shed base of 12.72 square metres (U1b Developed Land Sealed Surface).

Middle car park plot: Perennial Rye-grass dominated grassland of 77.17 square metres (g4 Modified Grassland).

Eastern car park plot: Perennial Rye-grass dominated grassland of 47.5 square metres (g4 Modified Grassland).

Disabled car park space (11.25 square metres) of ornamental shrub (5.43 square metres) (U1d 847 Introduced Shrub), and of human-trampled bare soil of (5.43 square metres)(510 Bare ground) and a metal drain chamber of 0.39 square metres (U1b Developed Land Sealed Surface) - the drain will be re-sited in same location as is so is not relevant to BNG.

An additional area of concrete path between the NW car park and the existing path of 7.5 square metres (g4 Modified Grassland).

In addition a small area of existing roadway and a drain of 6 square metres (U1b Developed Land Sealed Surface) will be grassed as Wildflower Meadow*.

The proposal also includes three small bicycle shelters to be sited on existing tarmac bays and these are not mentioned further as they are irrelevant to the impact assessment and BNG and temporary structures already exist.

As compensation 405 square metres that was g4 Modified Grassland at the qualifying period (currently part-grassed and part-stoned) will be enhanced to Wildflower Meadow and a further 6 square metres (see above*) will be created. 3 standard native trees will be planted. The ornamental shrubs will be moved to bare soil patches in the shrubbery and an additional native shrub added. The metric has a balance.

1.3 The site had no Priority Habitats or Irreplaceable Habitats, and no Protected Species (but did and does support a Priority Species Hedgehog). It is not a Biological Heritage Site and is not in a Wildlife Corridor. The site does not lie adjacent or near any such site. BNG requires we consider the impact of the development on nearby Priority Habitats etc.

- 1.4 David Bentley conducted the survey. He has been in conservation since 1983 and has been a professional ecologist since 1992. His reach covers all aspects of NW England ecology.
- 1.5 The CIEEM Guidelines are explicit in what is required to be assessed and provided:
- * A Habitat Survey Map.
 - * A desk study. In this case the NBN Atlas and iRecord were consulted.
 - * An assessment of the possible presence and likely importance of the following:
 - Plants
 - Fungi
 - Terrestrial and aquatic invertebrates
 - Fish (where relevant, based on an assessment of any watercourses and water bodies present);
 - Amphibians (including both breeding and terrestrial habitat)
 - Reptiles
 - Breeding, wintering and migratory birds
 - Bats (including potential roost sites, and foraging and commuting habitats/features)
 - Other protected or priority mammal species, as relevant.
 - * Mapping of any stands of non-native invasive plant species
 - * Recording of any incidental sightings of priority or protected species, or field signs of such species.
 - * Box 1 of the PEA Guidelines discusses Protected and Priority Species information and this is stated to include Protected and Section 41 Priority Species and Priority Habitats and also Red Data listed taxa and indeed Nationally Scarce taxa, as well as Birds of Conservation Concern Red (most declining) and Amber listed taxa. The JNCC Taxon List names the plethora of higher plants, bryophytes, fungi and wild animals, including invertebrates that are considered scarce.

2 METHODS

- 2.1 The survey morning was on 18th October 2024, on a non-school day All PPE was cleaned beforehand and afterwards to meet biosecurity needs.
- 2.2 It was a cool, dry day.
- 2.3 Plants were examined and noted to DAFOR rating. The site habitat was assessed with UKHab Ltd 2023 UK Habitat Classification Version 2 (at <https://www.ukhab.org>).

- 2.4 Debris in and adjacent the site was lifted to look beneath and examine. This can locate amphibians, signs of small mammals and invertebrates. Mammals can also be found through other clues such as droppings, footprints and trackways.
- 2.5 A invertebrate assessment was made by direct observation.
- 2.6 This is not a breeding bird survey but the habitat was assessed for current and recent use by breeding birds.
- 2.7 The school caretaker confirmed they had seen Hedgehogs in the school grounds.

3 DESK STUDY

- 3.1 The Ordnance Survey First Edition map of 1892 shows the site as an open field next to the Chapel Hill Quarry. By 1967 the school was built and the rest of the field was developed for housing - some of the existing area of grassland was hard surface and the existing car park had not been built.
- 3.3 The school caretaker confirmed Hedgehog (Section 41, Red Data Vulnerable) lives within the school grounds and footprints had already been noted by the ecologist in mud at the north side of the school buildings. NBN Atlas has records of Hedgehog in the locality.
- 3.4 The ecologist Dave Bentley has worked on the Alston Reservoirs to the south and can confirm Common Toads breed there. The Great Crested Newt records are all well to the south.
- 3.5 NBN shows a number of records with a 1km search of the school (these records also appear to include those on iRecord). The following have been recorded, with waterside and wider countryside birds excluded from this list:

House Sparrow (Section 41, Red), Wren (Amber), Dunnock (Amber), Chaffinch, Swift (Red), Swallow, Blue Tit, Great Tit, Coal Tit, Long-tailed Tit, Robin, House Martin (Red List), Sand Martin, Jackdaw, Magpie, Carrion Crow, Woodpigeon (Amber), Collared Dove, Rock Dove, Goldfinch, Bullfinch (section 41, Amber), Chaffinch, Greenfinch (Red), Goldcrest, Starling (Section 41, Red), Blackbird, Song Thrush (Section 41, Amber), Pied Wagtail, Nuthatch, Kestrel (Amber) and Sparrowhawk (Amber). Section 41 Species are UK Government Priority Species of Principal Importance. BoCC 5 Red List species are those with severe population/range declines whilst BoCC 5 Amber List species are those with moderate population/range declines.

- 3.6 NBN has a number of moth records from a moth trap running in Longridge and some common butterflies. There is a record of Section 41 Priority Species Wall Butterfly from 2007, 900 metres to the east, on the edge of Longridge. However Wall's habitat does not include short mown amenity grassland, amenity trees and tarmac.

4 RESULTS OF FIELD SURVEY

- 4.1 **A Habitat Survey Map** is appended below. No Schedule 9 alien invasive plants were recorded.

4.2 In the lists below the DAFOR is used as an expression of distribution and abundance on the site. Rare here means one plant present and does not signify a rare species.

A Plants recorded on the car park plot (this is largely rubble temporary hardstanding)

This presence of many heads of rye-grass suggest that the grass was shown when the hard area was last remodelled.

Perennial Rye-grass frequent

Yorkshire Fog frequent

White Clover frequent

Common Mouse-ear occasional

Selfheal occasional

Ribwort Plantain occasional

Common Ragwort (not caterpillar eaten) rare

Bramble (very occasional under trees)

The low mound of stripped soil down the sloping lawn area by the roadside has gathered some weedy plants but few of these were present in the well-tended lawn that existed prior to the construction works. Those in the top half of the list are likely to have been dominant in the damper downslope parts of the lawn.

Creeping Buttercup frequent

Creeping Bent frequent

Greater Plantain occasional;

Annual Meadow-grass occasional

White Clover frequent

Smooth Sow-thistle rare

Dandelion occasional

Black Medick rare

Common Ragwort rare

Spear Thistle rare

Hairy Bitter-cress rare

Trees impacted:

The arborist's report shows two trees overhanging the middle proposed parking spaces (these are already removed):

T21 Field Maple	Sub-mature dbh 40cm	Good condition	BNG Medium tree
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T22 (Silver) Birch	Young dbh 20cm	Good condition	BNG Small tree
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B Front lawn to school (not in development area)

By way of comparison the other lawn was examined and this appears to be different from the lawn in the car park area. Close mown lawn cut morning of survey.

Smooth Meadow-grass co-dominant

Common Bent co-dominant

Creeping Buttercup occasional

White Clover frequent
 Greater Plantain occasional
 Ribwort Plantain occasional
 Daisy occasional
 Dandelion occasional
Rhytidiadelphus squarrosus moss frequent
Calliergonella cuspidata moss frequent
 Golden Waxcap mushroom very occasional on high point of lawn

C The proposed Disabled Parking Space

Ornamental shrubs (U1d 847 Introduced Shrub, trodden bare soil (510 Bare ground), metal chamber lid(U1b Developed Land Sealed Surface). No shrubs qualify as trees.

Fuchsia (1) Global Register of Introduced and Invasive Species - Great Britain
 Himalayan Cotoneaster (not horizontalis) (1) - Global Register of Introduced and Invasive Species - Great Britain
 Wilson's Honeysuckle (yellow shrub)(1) - Global Register of Introduced and Invasive Species - Great Britain
 Prunus (2)
 Garden Rose (1)
 Poa annua – locally very occasional
 Pendulous Sedge very occasional, but frequent elsewhere in shrub beds

- 4.3 **Fungi.** We cannot be sure that the area to be developed was not of limited interest to grassland fungi but we know the grass that remains is a lower quality grassland than the front lawn, being of sown Rye-grass and Clover, and which was to some extent remodelled to accept the original car park plots. We do know that grassland that is mown very regularly does not allow taller grassland fungi to grow. The very few Golden Waxcaps found in the front lawn had already been damaged by the mornings' mowing, whilst some were deep in the turf. The trees that have been removed as they overhung the proposed car park spaces (T21 and T22) were younger than the school and the arborist's report indicates they were healthy and thus without fungal growth.
- 4.4 **Invertebrates.** The regularly mown lawn represents a poor invertebrate resource, excepting worms and fly larvae. Forbs soon lose their flowers to the blades and produce few of them. The trees lost to the car park plot are a Field Maple and a Silver Birch, and both can provide for a range of invertebrates. Silver Birch and another Birch species remain in the school grounds on this lawn area. There are young Field Maples within the tree belt at the NW edge of the school playing fields. The shrubs in the way of the disabled parking space will simply be relocated to bare soil areas with no loss of invertebrates feeding resource.
- 4.5 **Fish and amphibians.** There are no waterbodies on site. The Common Toads which breed in the nearby reservoir would need to migrate through a brand new small housing estate and over a main road and overcome the boundary wall to seek a land refuge on the school land, and the thoroughly manicured grounds suggest Toads would not bother to seek a habitat within the school grounds. If there was no Common Toad mitigation required by South Ribble for the development to the south then certainly it would not be required on this site.
- 4.6 **Reptiles.** There is no potential Reptile habitat on site. As an example, there are records of Common Lizard over 4 and 5 km to the north and north east in suitable habitat.

- 4.7 **Breeding, wintering and migratory birds.** Lawns are known to attract garden birds which seek out worms and fly larvae. This will be the case here. Alston Reservoirs most certainly attract feeding, breeding and migrating birds and 20+ years ago one of them was drained to create a large marshland habitat. The presence of the reservoirs and marshland and adjacent farmland simply mean many species head there rather than to the impoverished school grounds. Healthy Silver Birch and Field Maple standard trees in lawns provide zero to low opportunities for bird nesting. There is potential for small birds to nest in the two well-clipped ornamental shrubs Himalayan Cotoneaster and Wilson's Honeysuckle. In general we can say that that the school trees and grassland provide feeding opportunities for garden birds, whilst nesting opportunities are more likely to be found in garden shrubs, whether in private gardens or in the school grounds.
- 4.10 **Bats.** The trees removed for the car park spaces had no potential for roosting bats according to an ecologist's reading of the arborist's report. Lines of trees do attract feeding bats and this line of trees has been severed.
- 4.11 **Mammals.** The NBN Atlas has records of Hedgehog in the wider vicinity and Hedgehogs have been confirmed as feeding in the school grounds, with footprints found during the survey. There appears to be little potential shelter habitat within the school grounds and there is (was) none within the proposal area. **Hedgehogs are a Red Data Near Threatened Section 41 Priority Species of Principal Importance and the Local Planning authority has a legal Biodiversity Duty to seek to conserve the species.**
- 4.12 **Schedule 9 alien invasive plants.** No Schedule 9 alien invasive plants are present in the proposal areas.
- 4.13 **Priority Habitats nearby.** MAGIC Map and the Priority Habitats Inventory show non-priority semi-improved good grassland around Alston Reservoirs. The car park proposal has no impact on these habitats.

5 DEVELOPMENT CONSTRAINTS, IMPACT MITIGATION AND BNG UPLIFT

- 5.1 **Impact on Lawn** - The plans indicate that 204.5 square metres of low value Perennial Rye-grass - White Clover and Creeping Bent - Creeping Buttercup Amenity g4 Modified Grassland will be lost to the new car parks and the additional path area. In order to compensate and provide BNG uplift of 10% the retained grassland alongside the car park extensions (most of which has already been destroyed) totalling 405 square metres (tree bases and shrubs not included) will be resown and maintained as a wildflower meadow. This is classed, in this case, as enhancement and not creation. To this is added a small area of existing tarmac, kerb and drain (6 square metres) which will be converted to wildflower meadow – this is classed as habitat creation.

The existing stoning will be broken up and removed, but given this is basically low fertility subsoil then only the top 30cm (and any plastic/ glass debris) need be removed. The top 30 cm will be replaced with a low fertility clean sub-soil and a native wildflower mix, suitable for the locality, will be sown and maintained by an annual cut and topping up seeding as appropriate. It is imperative that the newly imported soil does not contain alien weeds, shrubs,

garden plants or waste debris. It is imperative that the site is managed as a wildflower meadow with suitable signage to ensure it does not simply become part of the mown amenity grassland of the school. So the grass will be cut last time in April and then again in September and over the autumn if so wished, but not in late spring or summer. The club will have to have suitable signage in place to stop accidental cuts. This is a suitable seed mix: <https://wildseed.co.uk/product/mixtures/wild-flower-only-mixtures/wild-flowers-for-clay-soils/>

Wildflower meadows boost biodiversity and invertebrate numbers (including pollinators) and this in turn provides knock on benefits to higher animals (e.g. Hedgehogs and Bats and insect-eating birds).

Impact on Ornamental Shrubs (u1d 847) and Bare Ground (510) and nesting bird consideration. The 5.43 square metres of shrubs of the new Disabled Parking Plot will be lifted and translocated to 5.43 square metres of bare soil in the adjacent weeded beds. This will mean no net loss of shrubs (potential bird nesting habitat) but a combined loss of bare ground of 5.43 plus 5.43 = 10.86 square metres of bare ground. It is not intended to provide replacement bare soil.

The two clipped ornamental bushes need to be relocated/reduced before (or after) the bird nesting period, and not within the spring or summer nesting periods unless allowed in writing by an ecologist. The translocation of these shrubs to bare soil habitats within the adjacent shrubs beds will mean no loss of potential nesting habitat. The bushes will be lifted with a small bucketed machine and replanted in adjacent existing bare soil locations. In order to provide uplift in shrub habitat (BNG) an additional (but native) shrub Guelder-rose will be planted in a location with bare soil. Guelder-rose have pretty white flowers and red berries but lose their leaves in winter.

The two trees were removed once the bird nesting period had concluded.

- 5.3 **Hedgehog impact.** Nothing is planned that will cause more than a minor potential temporary risk to Hedgehogs or their movement. However it would be wise to ensure that the new perimeter paladin fence around the school allows for hedgehog movement, but this will hopefully have been attached to the consent for the fencing. Site workers need to be made aware that any drainage modifications need to be covered to prevent Hedgehogs falling in when they are out and about at night. The creation of a wildflower meadow will improve the diversity of invertebrates available for Hedgehog feeding.
- 5.4 **Tree loss compensation.** To replace the loss of the trees comprising 1 Good Condition Small Silver Birch Tree and 1 Good Condition Medium Field Maple Tree. The BNG metric (plus 10%) give these a unit value of 0.02244. We need to plant trees to meet that value. The tree helper within the metric and to surface that we need to plant and maintain to maturity 3 good quality standard trees. Rowan, Silver Birch and Field Maple will be planted in a row on the south west boundary of the playing fields, to boost an existing small linear plantation. Other trees already planted here should be fixed to new poles to improve their growth. All of these trees grow small in scale and the location will not impact the playing field or the light to adjacent house gardens, being on their north sides.
- 5.5 From The Statutory Biodiversity Metric User Guide February 2024 and July 2024: "Principle 2 "The use of this biodiversity metric does not override existing biodiversity protections,

statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.”

6 Statement of Mitigation Hierarchy and Biodiversity Net Gain

- 6.1 We have included some native tree and shrub planting and enhancement of LOW-VALUE amenity grassland to wildflower meadow. The metric tool has a tool break but this is an issue with the metric spreadsheet. We are creating 6m of wildflower meadow and enhancing 405m of improved lawn to wildflower meadow.
- 6.2 Ribble Valley Borough Council Core Strategy 2008 – 2028 A Local Plan for Ribble Valley Adoption Version states (OUR RESPONSE IN CAPITALS)

Environment

1. Consider the environmental implications such as SSSI, County Heritage Sites, Local Nature Reserves, biodiversity action plan (BAP) habitats and species, special areas of conservation and special protected areas, protected species, green corridors and other sites of nature conservation. THERE ARE NO SUCH SITES ON OR ADJACENT THE PROPOSAL (NOR ARE THERE IRREPLACEABLE HABITATS) , AND WE HAVE SUGGESTED MEASURES TO AVOID ACCIDENTAL HARM TO PRIORITY SPECIES HEDGEHOGS AND BOOST THEIR FEEDING OPPORTUNITIES.

2. With regards to possible effects upon the natural environment, the council propose that the principles of the mitigation hierarchy be followed. This gives sequential preference to the following: 1) enhance the environment 2) avoid the impact 3) minimise the impact 4) restore the damage 5) compensate for the damage 6) offset the damage.

3. all development must protect and enhance heritage assets and their settings.

4. all new development proposals will be required to take into account the risks arising from former coal mining and, where necessary, incorporate suitable mitigation measures to address them.

5. achieve efficient land use and the reuse and remediation of previously developed sites where possible. previously developed sites should always be used instead of greenfield sites where possible

THE PROPOSAL USES LOW VALUE AMENITY GRASSLAND THAT WAS DESTROYED EARLIER TO FACILITATE BUILDING WORKS AT THE SCHOOL AND CREATES WILDFLOWER MEADOW. THE PROPOSAL RESTORES SOME OF THE DAMAGED LOW VALUE HABITAT AND COMPENSATES AND PROVIDES BNG OFFSET BY ENHANCING IT TO WILDFLOWER MEADOW. A LARGER CAR PARK WOULD HAVE ENABLE DRIVERS EASIER ACCESS TO THEIR CARS BUT THIS GREATER LAND-TAKE HAS BEEN AVOIDED BY ACCEPTING THAT CARS WILL BE BLOCKED IN BY OTHER CARS.

6.3 Biodiversity Gain Plan

<https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan#download-a-plan-template>

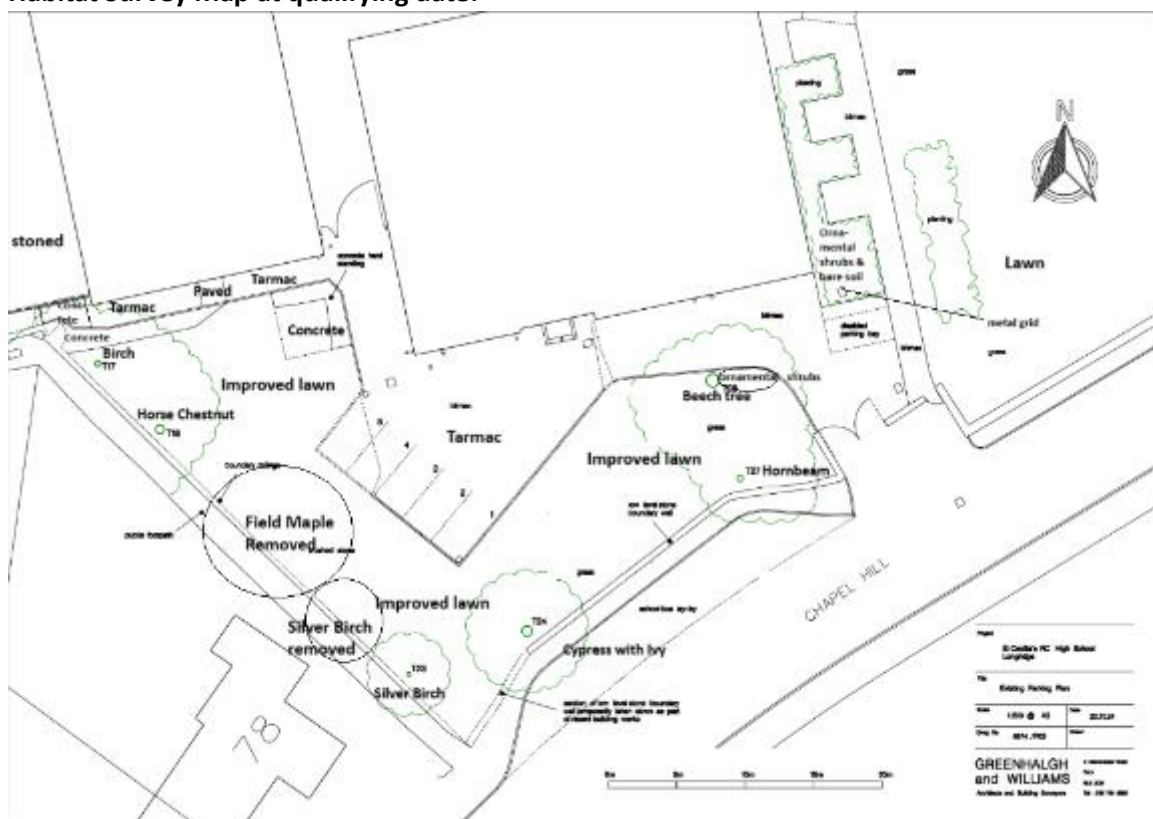
“The purpose of the Biodiversity Gain Plan is to:

clearly and consistently demonstrate how development proposals meet the statutory requirements;
provide evidence for your BNG decisions;
help local planning authorities (LPAs) to determine whether the development meets the BNG requirements.”

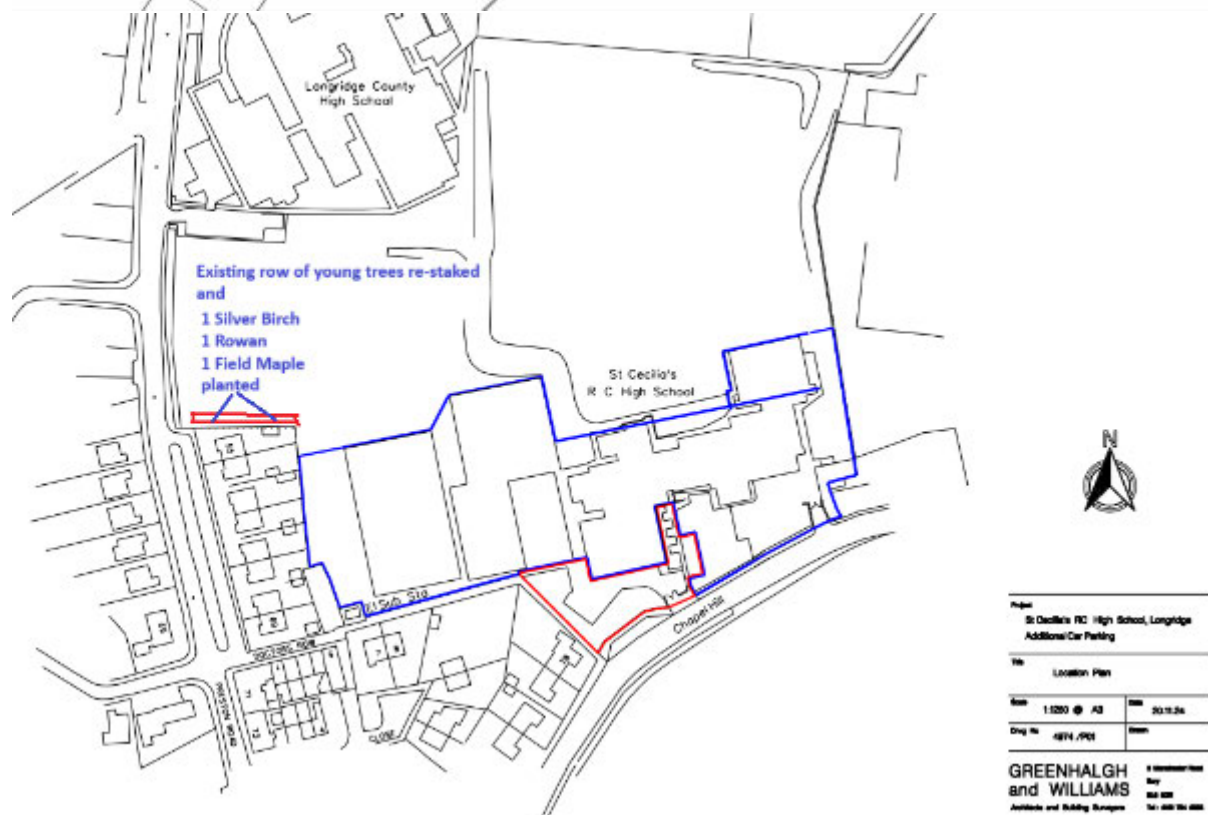
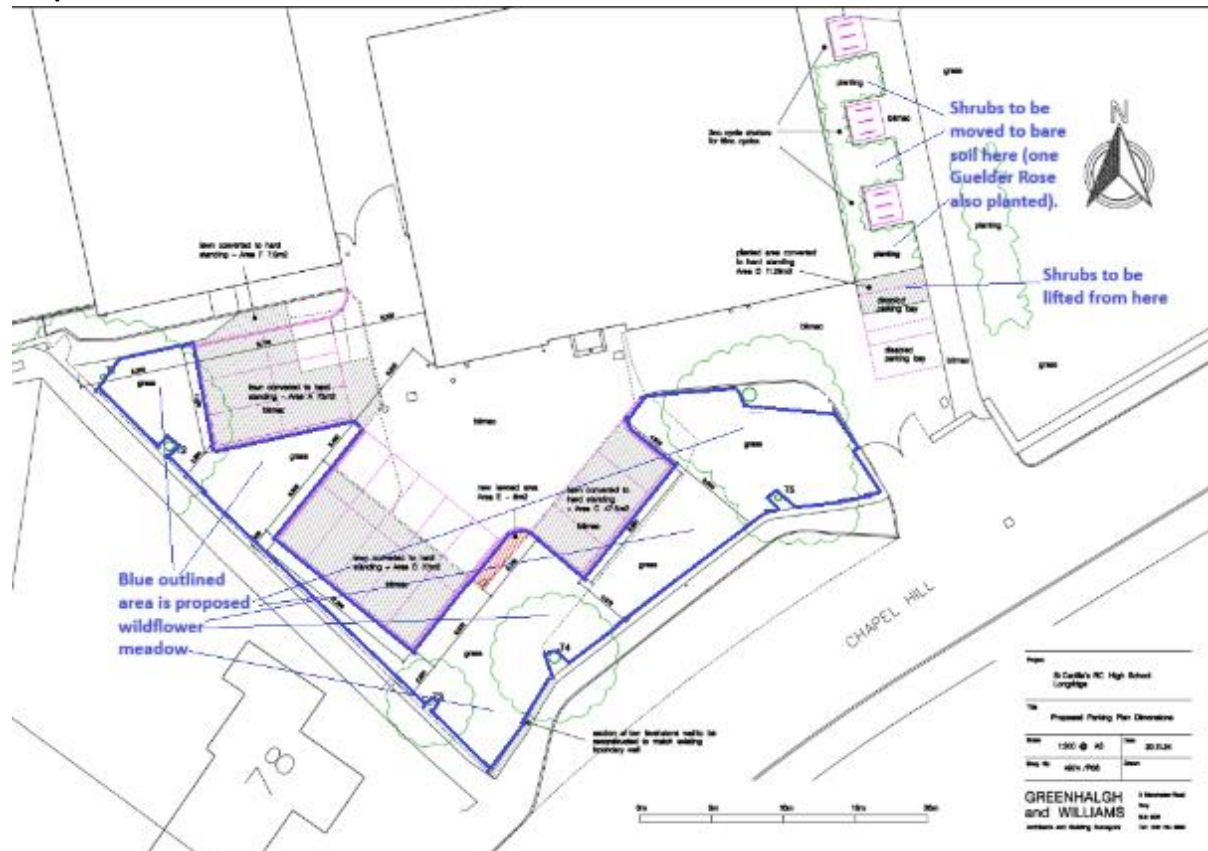
“Submit your plan. You can submit the biodiversity gain plan to your LPA after they approve your planning application.

Your planning permission includes the biodiversity gain condition, so you cannot start the development until the LPA approves your biodiversity gain plan and biodiversity metric tool calculation.”

Habitat Survey Map at qualifying date:



Proposal Plan:





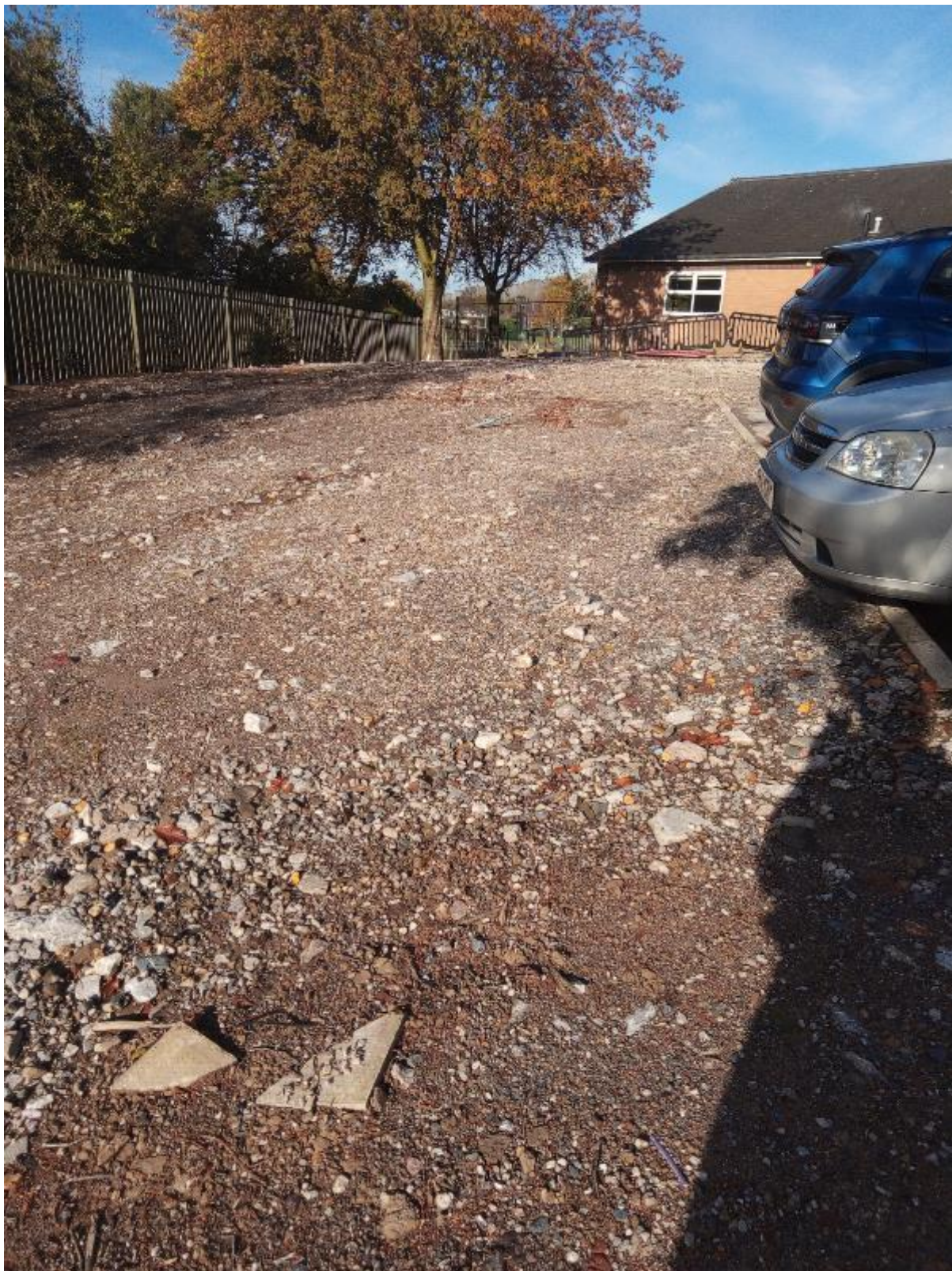
Above: Ornamental shrubs and grid and bare soil proposed Disabled Parking Spot



Above. Intact grassland proposed as some of the Wildflower Meadow



Above. Proposed eastern car park plot



Above: Proposed middle car park plot



Above: Proposed NW car park plot



Above: one of the bare soil areas for shrub translocation



Above: Hedgehog print from the edge of the playing field



Golden Waxcap on the front school lawn not in proposal area



Above: This edge by house is site for three new standard trees and fixing posts to existing planted trees

END