

Our ref: 8439 / AGE / AJC / JSE / SMM

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8th April 2019

Dear Mr Lewis,

HENTHORN ROAD, CLITHEROE – PLANNING APPEAL REF: APP/T2350/W/19/322/189

Further to the Pre-Conference Note dated 12th March 2019 we have been asked by Gladman Developments Ltd to provide a short statement to cover ecology matters relating to the above site and associated application. The statement comprises:

1. A summary of the ecological assessments undertaken and a summary of findings.
2. An evaluation of any potential ecological impacts.
3. A response to comments made by local residents regarding the effects of the above application on wildlife (paragraph 5, Pre-Conference Note, 12th March, 2019).

Ecological Assessments

At the early stages of the development for this planning application, the potential ecological value of this site was assessed. An initial scoping exercise was undertaken on 8th May, 2018 to identify likely features of ecological importance. Desk study information was also compiled at this stage to further inform the assessments. A Phase 1 and Preliminary protected species survey was subsequently undertaken on 7th June, 2018 by an experienced botanist. All survey work which was then recommended as a result of the initial assessments was subsequently commissioned and undertaken between May and September 2018 to ensure an accurate ecological baseline and inform the development framework of any potential ecological constraints. A summary of ecological surveys undertaken, a brief description of our findings and our conclusions with regards to potential impacts on nature conservation are provided below.

Designated Sites

There are no sites of international nature conservation importance within 10km and no designated sites of national nature conservation importance within 2km of the survey site. There are three non-statutory Biological Heritage Sites (BHS) within 1km of the application site, these are River Ribble, Primrose Lodge and Barrow Clough Wood. The Ecological Appraisal identified a potential impact in

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the form of pollution such as soil / silt laden run off or accidental spillages during construction works in relation to the River Ribble. However, recommendations have been made to the adoption of sound site management principals and best practice guidelines for working near water. By working to recommended guidelines it is anticipated that any potential negative impacts in association with wetland habitat will be prevented. Both Primrose Lodge and Barrow Clough Wood BHS do not have any formal public access arrangements and as such negative impacts are not anticipated.

Habitats

The site comprised a single field compartment, largely of poor semi-improved grassland with a small section of moderately species rich neutral semi-improved grassland in the south-eastern corner. The field boundaries were formed by native species hedgerows.

The species poor semi-improved grassland was considered to be of low nature conservation value. The small area of semi-improved neutral grassland has been assessed as a Habitat of Principal Importance though as it is broadly analogous with NVC community (MG4) *Alopecurus pratensis-Sanguisorba officinalis* grassland and therefore has the potential to be representative of Lowland Meadows Habitat of Principal Importance under the NERC Act (2006). However, the area of grassland would not meet criteria for qualification as a Biological Heritage Site within Lancashire¹ as the area falls below the minimum required for selection. As such the area of grassland is considered to be of importance at a local scale.

Four hedgerows comprise the site boundaries; all were greater than 20m in length and comprised more than 80% native species. As such, all hedgerows qualify as Habitats of Principal Importance under the NERC Act (2006). Three hedges (H1, H2 and H3) were found to be of high ecological value (Grade 1 or Grade 2 under the HEGS methodology) however none of them were deemed to be 'Important' under the Wildlife and Landscape criteria of the Hedgerow Regulations (1997).

The development framework reflects the importance of the grassland within the site by its retention and buffering by further greenspace with additional new tree planting. The majority of hedgerows are also to be retained with an additional green buffer to be created around all existing field boundaries. Minor hedgerow gap creation may be required along hedgerow H1 and H2 to facilitate pedestrian access to the existing residential development to the north-east of site and some minor losses (approx. 7m in total) either side of the main development access in H3. This has been reduced as much as possible by siting the access at the location of an existing field gate. The losses would ultimately be very small and as such are not considered to impact upon the status of the hedgerows. Proposed scrub and hedgerow planting is considered to represent substantial opportunities to compensate for the minor losses and provide a net gain in the hedgerow resource in the long term.

Badger

Consultation with the local biological records office provided no records of badger within 1km of the site. No evidence of the presence of badger was recorded within the site during the survey and, as such, badgers are not considered to pose an ecological constraint and therefore no potential impact is anticipated.

¹ Bell (1998) Biological Heritage Sites: Guidelines for Sites: Guidelines for Site Selection. Lancashire County Heritage Sites Scheme. Lancashire County Council.

Bats

On site habitats were assessed for their potential to support bat species. A small number of mature trees were recorded across the site, primarily in association with the hedgerow network. These were visually assessed on 7th June, 2018 from ground level, during which, two trees were identified as having moderate bat roosting potential. Bat activity surveys using static bat detectors and transect surveys were undertaken to determine bat activity and general behaviour within the site. Surveys were undertaken during spring, summer and autumn.

Five species of bat were recorded on site, comprising common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *P. pygmaeus*, Nathusius' pipistrelle *P. nathusii*, a Myotis species *Myotis* spp., and noctule *Nyctalus noctula*. The species and composition of bats recorded between the two survey methodologies was broadly similar. The level of bat activity recorded was considered fairly unexceptional during the surveys given the sites rural setting. The species recorded, with the exception of Nathusius' pipistrelle, are generally considered widespread and common in Lancashire². Nathusius' pipistrelle was considered rare however; it is thought that this may simply be due to the species being under-recorded³. A technological advance within bat activity recording equipment has resulted in an increase in records of this species. Surveys recorded only a single registration for Nathusius' pipistrelle over all surveys undertaken and, as such, the site is not considered to represent a significant resource for this species.

To minimise potential impacts the development framework has retained all areas of higher value habitat resources whilst the development proposals are confined to the areas of semi-improved grassland which is considered sub-optimal for foraging bats. As such, all trees, the majority of the hedgerows and the semi-improved neutral grassland area are to be retained and buffered within the proposed greenspace. As part of detailed development design, an appropriate lighting scheme will ensure that any lighting will be directed away from likely bat habitat resources including the trees and hedgerows. Additional enhancements have been recommended in the form of bat boxes installed on retained trees to increase the availability of suitable roosting habitat. As such, no negative impacts to bats are anticipated from interference by light spill, the loss of potential roosting, foraging or commuting habitat.

Birds

Two breeding bird surveys were undertaken during May and June, 2018. The site is considered in terms of its nature conservation value as of local importance for breeding birds. A total of 20 species were recorded during the surveys, overall the diversity was quite low and to be expected from an arable site. Four Species of Principal Importance (SPI) (Section 41, NERC 2006), three appear on the BoCC (2015)⁴ as Red-listed and four are Amber-listed, and as such are considered 'notable' (some species may have multiple designations). None of the birds were confirmed to be breeding on site. However, five species were considered probable breeders whilst eleven species were considered possible breeders.

² Lancashire Wildlife Trust: accessed 20/03/19 <https://www.lancswt.org.uk/blog/charlotte-varela/which-bat-species-lancashire>

³ Bat Conservation Trust: accessed 20/03/19 <https://www.bats.org.uk/our-work/national-bat-monitoring-programme/surveys/national-nathusius-pipistrelle-survey>

⁴ Eaton, M.A., Aebischer, N.J., Brown, A., Hearn, R.D., Lock, L., Musgrove, A.J., Noble, D.G., Stroud, D.A. and Gregory, R.D. 2015. Birds of Conservation Concern, the population status of birds in the United Kingdom, Channel Islands and the Isle of Man. *British Birds*. 108: 708-746.

All trees within the site were visually assessed for the existence of large cavities with the potential for use by nesting or roosting barn owl. No evidence of this species was recorded during the survey and as such there is no ecological constraint with regards to this species.

Construction works likely to disturb and impact upon nesting/breeding birds include initial ground works, vegetation clearance and construction activities which will result in noise and vibration and loss of suitable breeding habitat. All birds, their nests and eggs are protected under The Wildlife and Countryside Act 1981 (as amended). Four species of birds with conservation designations recorded during the surveys are particularly vulnerable to potential impacts at the construction phase due to their ecological requirements.

Impacts to bird species are considered to be short term and will be mitigated for appropriately prior to commencement of works. The Development Framework proposes to retain all trees, the majority of the hedgerows and the area of semi-improved neutral grassland which will provide foraging and nesting opportunities for birds. Post development impacts are anticipated with regards to increased cat predation from new residents. Recommendation to offset potential impacts from this have been proposed.

Great Crested Newt

During the initial scoping survey, two ponds on site and two ponds off site were identified within 500m of the site boundary. A Habitat Suitability Index assessment was undertaken on all ponds. Two of the ponds assessed were dry at the time of survey and two ponds underwent aquatic great crested newt surveys. No great crested newts were recorded during the surveys, as such it is considered there is no ecological constraint / impact with regard to this species.

Reptiles

Desk study consultation with the local biological records office provided no records of reptile species within 1km. Habitats on site had very little suitability for common reptile species, as such it is not considered that this group of species poses a potential ecological constraint and no development impact is likely.

Biodiversity Offsetting

In order to demonstrate that the development could result in a measurable net gain for biodiversity, a Biodiversity Offsetting metric (Environment Bank Biodiversity Impact calculator V1.2) has been used to quantify biodiversity values of site habitats pre- and post-development. The assessment is provided in Appendix A below.

The assessment of post-development habitats is based on the Framework Plan (FPCR 8439-L-02 Rev C), and as such the following assumptions have been made, which are considered appropriate and realistic:

- A precautionary 70:30 split for buildings/hardstanding to gardens/amenity grassland within the proposed development footprint;
- Enhancement of the retained semi-improved neutral grassland within the south east of the site through species planting and / or appropriate management;
- The retention of species poor semi-improved grassland at the boundaries of the site, outside the proposed development footprint, and enhancement through species planting and appropriate management;

- Enhancement of the retained watercourse through the removal of debris and removal of cattle grazing of banks; and
- Creation of wildflower grassland around the proposed attenuation feature.

Given the retention and enhancement of higher value habitats and the implementation of green infrastructure creation as shown on Framework Plan Ref: 8439-L-02 Rev C, the proposed scheme is considered able to deliver a net gain in biodiversity with a net gain of 0.8 habitat units (Appendix A).

In terms of linear features, small sections of hedgerows H1 (1.5m), H2 (3.6m) and H3 (13.1m) are to be lost to facilitate site access (footpath links and the access road), which results in an impact of -39.9 linear units.

Although no hedgerow planting is shown on the Framework Plan, the creation of 52m of new native hedgerow within the proposed area of green infrastructure would compensate for this loss and achieve a net gain of 0.1 linear units.

Given the extent of the proposed green infrastructure, it is considered feasible that new hedgerow planting of a minimum of 52m can realistically be incorporated and as such contribute to the net gain in biodiversity provided within the proposed development.

Local Resident's Comments

Comments from local residents have been raised regarding impacts upon nature conservation and local wildlife. From a review of the correspondence received, the majority of the comments with regards to ecological issues are concerns regarding general loss of the countryside, partial loss of a hedgerow and harm to birds and deer. Where comments are made regarding specific issues, we have presented them below in italics followed by our response.

A full ecological appraisal assessed the ecological impacts of the scheme on all identified habitats and species groups. The surveys and assessments gave due consideration to all relevant legislation, planning policy and survey guidance. Potential impacts that were identified within the scope of this assessment are primarily concerned with impacts during the construction phase and these have been addressed by an appropriate mitigation and compensation strategy within the Ecological Appraisal and Breeding Bird Report (FPCR, 2018). The development Framework seeks to retain and buffer all habitats of higher ecological value, protecting them in the long term. No protected species were recorded on site and as such it is concluded that there will be no negative impact upon such species.

*I have seen barn owls hunting over this field and others close by, some now being built on...***Ms Penny Pitty**

The species poor semi-improved grassland appeared to be managed for haylage and grazed by sheep as such providing suboptimal conditions to support a good field vole population, the main prey source for barn owl. The area of semi-improved neutral grassland in the south-east of the site provides better habitat for field vole partly due to the fact both the sheep and machinery cannot reach this part of the field, creating a more developed thatch of dead grass material, preferred by field vole. This better quality grassland (in terms of supporting field voles) is to be retained within the development design and, as such, will continue to offer suitable barn owl foraging habitat. There is, therefore, not expected to be any impact on barn owl foraging as a result of the proposals.

Song thrushes have recently nested in the hedges opposite the proposed development (the appraisal notes that they were recorded in 2009, but they were certainly nesting this spring – 2018

– very close to the site). The Breeding Birds report notes that house martins (*Amber list species*) were observed flying over the site...I share the concern expressed in the Breeding Birds report regarding the increased number of cats which would result from the development. If the development goes ahead it would be beneficial if some of the properties have nest bricks inserted into the walls as has been the case on the Ribble Meadows estate...**Ms Penny Pitty**

The Ecological Appraisal, together with the supporting Breeding Bird Report recommended a range of species specific and general enhancements to offset any potential impacts to local wildlife including mammals and birds.

Section 5.45 of the Ecological Appraisal included recommendations for general biodiversity enhancements, comprising;

- An ecological management plan should be devised and adhered to for all retained and created habitats in order for them to maintain existing value and/or realise enhanced values, making sure that management is appropriate and ongoing for the life of the development.
- Small gaps could be left under or in the corners of garden fences to permit access for wildlife such as hedgehogs, badger and fox.
- Deadwood piles could be created in areas of retained open space to provide a habitat niche for amphibians and small mammals as well as deadwood for invertebrates such as saproxylic beetles.
- The attenuation area should be designed to provide optimal habitat for wildlife as well as serving drainage functions, for example a storage pond designed to hold water all year round, or else a scrape planted with a meadow mixture for wetlands.

Furthermore, Table 6 in Section 6.2 and sections, 6.3 and 7.2 of the Breeding Bird Report include recommendations for a range of bird species recorded on site during the surveys.

- Strategic placement of house martin nest box cups around the development would provide new breeding sites. These should be fixed under eaves away from doorways and windows.
- Strategic placement of house sparrow nest-box terraces around the development would provide new breeding sites. Bird feeders could provide supplementary food in winter.
- In order to deter encroachment of domestic cats into sensitive areas offsite (e.g. adjacent arable habitat in which ground-nesting farmland species may breed) it is recommended that the boundaries around the development are strengthened through the planting of native thorny plant species such as blackthorn *Prunus spinosa* and hawthorn *Crataegus monogyna*.
- Native trees and shrubs will be planted along the boundaries and within areas of public open space.
- The native hedgerows will be retained.
- Areas of wildflower meadow grassland will be created within the public open space.
- Wetland grassland will be created on the banks of the ephemeral attenuation features.
- Nest boxes will be erected on retained trees at the site boundaries. These will provide nesting opportunities to a range of bird species including blue tit *Cyanistes caeruleus*, tree sparrow *Passer montanus* and house sparrow *Passer domesticus*.
- The planting of native trees and shrubs should increase the availability of nesting habitat for a number of species including bullfinch *Pyrrhula pyrrhula*, song thrush and members of the tit and warbler families, whilst continuing to provide abundance of food items contributing positively to breeding success throughout the site.

Overall, given the size of the site and the nature of the proposals, an accurate assessment of the ecology and likely impacts has been presented, both within the ecological reports and additional

information provided in this letter. As the development framework seeks to retain the higher value habitats within the design of the scheme with additional greenspace, we feel that there will not be a negative impact on protected species and habitats in the long term.

I trust the above is acceptable to you. Please do not hesitate to contact me should you require any further clarification or wish to discuss the above in more detail.

Yours sincerely



Annina Eales
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FPCR Environment and Design Ltd

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Appendix A

Development Biodiversity Impact Summary



Local Planning Authority:	Ribble Valley Borough Council
Site name:	Henthorn Road, Clitheroe
Planning application ref:	3/2018/0688
Site grid reference:	SD 729 408
Assessor:	Aveline Cruickshank
Date:	8th April 2019

Biodiversity impact accounting	Area (ha)	Units
Existing site	4.94	12.32
Gross biodiversity loss	3.81	7.62
Onsite compensation gain		8.42
Net biodiversity balance		0.80
Percentage of gross impact loss		
Percentage of site biodiversity loss		

Linear features	Length (m)	Linear units
Total existing length onsite	887.2	2397.6
Linear loss	18.2	51.0
New proposed hedgerows	52.0	
Net linear balance	1.0	

Development biodiversity impact	Units
Habitats	Net biodiversity gain
Linear	Net linear gain

Offsite conservation credit requirement to deliver no net loss to biodiversity

Habitat	Conservation credit requirement
Total habitats (units)	0.00
Total Linear (m)	0.00

See adjacent sheet for habitat specific requirements

For any questions with regard to biodiversity impact and this development, or if there is an anticipated loss to biodiversity and no further ecological enhancements can be incorporated within the development it may be possible to compensate for this loss through a biodiversity offsetting scheme. Please contact us.

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KEY	
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Parcel ID	Proposed habitats on site Development, mitigation and onsite compensation		Target habitats distinctiveness		Target habitat condition			Temporal factor		Difficulty factor		Biodiversity units generated	Comment
	Target habitat	Area (ha)	Distinctive	Score	Condition	Score		Time (years)	Score	Difficulty	Score		
	1: Habitat recreation Enter target habitat to be recreated on area of development habitat impact											(Q1 x R1 x S1) / T1 / U1	
	Built Environment: Buildings and hardstanding	2.24	None	0	Poor	1		5 years	1.2	n/a	1	0.00	
	Built Environment: Gardens and amenity areas	0.96	Low	2	Poor	1		5 years	1.2	Low	1	1.60	
	Grassland: Amenity grassland	0.12	Low	2	Poor	1		5 years	1.2	Low	1	0.20	
	Grassland: Other medium distinctiveness grassland	0.11	Medium	4	Poor	1		10 years	1.4	Medium	1.5	0.21	Creation of semi-improved grassland around the proposed attenuation feature.
	Freshwater: Sustainable Urban Drainage Systems	0.21	Medium	4	Good	3		5 years	1.2	Low	1	2.10	
	Built Environment: Buildings and hardstanding	0.17	None	0	Poor	1		5 years	1.2	Low	1	0.00	Proposed footpath around proposed development.
	Total	3.81									Total	4.11	W
	2: Habitat creation Enter new target habitat to be created on land protected during development. To be of higher value than existing						Existing value V2 (= I)					((Q2 x R2 x S2) - V2) / T2 / U2	
	Grassland: Other medium distinctiveness grassland	0.61	Medium	4	Moderate	2	1.22	10 years	1.4	low	1	2.61	Retention of species poor semi-improved grassland at the site boundaries (outside development footprint) and enhancement through species planting and appropriate management.
	Total	0.61									Total	2.61	X
	3: Habitat restoration Enter target habitat of retained areas to be restored						Existing value V3 (= G)					((Q3 x R3 x S3) - V3) / T3 / U3	
	Grassland: Other medium distinctiveness grassland	0.29	Medium	4	Good	3	2.32	5 years	1.2	low	1	0.97	Retention of semi-improved neutral grassland (east of watercourse) and enhancement to good condition through species planting and / or appropriate management, with public access limited
	Grassland: Other medium distinctiveness grassland	0.20	Medium	4	Moderate	2	0.80	5 years	1.2	low	1	0.67	Retention of semi-improved neutral grassland (west of watercourse) and enhancement to moderate condition through species planting and / or appropriate management
	Freshwater: Rivers and streams	0.02	High	6	Good	3	0.24	5 years	1.2	Medium	1.5	0.07	Enhancement through removal of debris, enhancing adjacent habitats and reducing grazing of banks.
	Total	0.51									Total	1.70	Y
											Trading down correction	0.00	Z
											Onsite compensation gain	8.42	OCG = W + X + Y - Z
											NBB = OCG - GBL		
											Net biodiversity balance	0.80	Net gain
											Percentage of gross impact loss		
											Percentage of site biodiversity loss		

