



**Lancashire,
Manchester &
N Merseyside**

Development Management
Town Hall Knowsley Street,
Bury,
Lancashire,
BL9 0SW

30th November 2021

FAO Helen Leach

Dear Ms Leach

Re; Application 67658 | Change of use of the land for use as outdoor sports pitches including engineering operations to form 4 pitches, the construction of a clubhouse, ancillary storage structures, creation of access from Radcliffe Moor Road, parking, landscaping, drainage and associated works. | Land to west of Radcliffe Moor Road/Bury New Road, Radcliffe

The Lancashire Wildlife Trust has considered the proposed application and would like to provide the following comments.

The application boundary is immediately adjacent to Bradley Fold Grade C Site of Biological Importance (SBI). The SBI is centred on a number of lodges that form a connective link east to west. Breeding Common Frog, Palmate Newt and Smooth Newts have been recorded together with Common Toad (a UK Priority and Protected Species). The Lodge habitats themselves are also listed as a Greater Manchester Biodiversity Habitat. The Interest of the lodges also lies in their botanical diversity with plants such as Sneezewort, Gypsywort, Water Plantain, Wild Angelica, Trifid Bur Marigold, Flag Iris, Cuckoo Flower, Bittersweet and Skullcap all being found. The Trust notes that the Ecological Survey and Assessment report dated September 2021 indicates that without protective measures the SBI is likely to be affected by the proposals during both the construction and operational phases of the development. Whilst the Trust welcomes the provision of a buffer zone between the development and the SBI, the Trust has some concerns regarding potentially increased fertiliser run-off into the lodges from the sports pitches. The current and proposed surface drainage is to allow run-off into the lodges and water courses. The delicate balance of fauna and flora could be affected by increased fertiliser loads. Further information should be



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provided to indicate if there are any increases in fertiliser applications, what these increases are and what effects this might have on the SBI. It is noted that the ecology report indicates that the buffer provision is to incorporate the existing hedgerows, tree line and marshy grassland habitat, as well as marginal areas managed for biodiversity as well as the production of a habitat management plan. The plan needs to provide more detailed information on the scope and extent of biodiversity provision as well as clarifying the lifespan of the proposed management, how the works are to be funded and who will be undertaking the proposed aftercare?

The Trust feels that more ecological provision can be gained by altering the layout of the design so that the southern pitch is brought further to the north. The southern buffer zone can then be extended and managed to provide an ecological extension to the SBI. This will allow the provision of swails that can take run-off from the pitches and allow it to be filtered before entering the SBI wetland. The ecology report also indicates that Willow Tit; a UK Priority Species has been recorded on site. The scrub habitat within the SBI and to the west running north to south looks like suitable habitat for this species. A larger buffer zone would allow the planting of appropriate species such as willows that can help provide linkages for this rare species.

The Trust notes that the majority of the hedgerows within the site, which have been identified as priority habitat, are to be retained. Hedgerow 2 however is to be lost. The ecology report recommends replacement planting to an equal or greater length. Whilst the Trust welcomes the commitment to replace lost habitat, the Trust would stress that the biodiversity mitigation hierarchy of avoid then mitigate and then compensate must be followed. Compensation must be the option of last resort. Why can the hedgerow not be retained or if necessary moved slightly so that it lies between the two sets of pitches? The current hedge provides a corridor north to south through the middle of the site, which is currently undisturbed and the development will mean the loss of this north to south corridor, with no replacement offered. It is difficult from the Landscape Plan to determine exactly where the new hedge planting will be, but the map seems to indicate planting around the car park area. This habitat will be heavily disturbed by cars and people and could not be class as a like for like replacement to compensation for the loss of the existing undisturbed hedgerow. Clarification of the location of replacement planting should therefore be provided, including how current ecological corridors are to be maintained and enhanced north to south. It should be noted that Biodiversity Net Gain (BNG) for linear habitats such as hedgerows must be accounted for as a separate metric. The Defra BNG metric must show that BNG has increased for linear habitats such as hedgerows as a direct result of the development proposal. The development should also aspire to at least a 10% increase in the BNG metric for hedgerows.



The ecology report indicates that the existing field is not representative of semi-natural habitats, however, the presence of Common Bird's-foot-trefoil and Meadow Vetchling and along the edges of the field; Common Knapweed indicate evidence of low nutrient input and show evidence of some species interest. All three of these species are qualifying species for Gr2 within the Greater Manchester Sites of Biological Importance; site selection guidance. Given the recent mowing of the grassland habitat prior to survey, the abundance of these species may have been underestimated. A precautionary approach should be taken and a more appropriately timed survey undertaken. The ecology report goes on to propose that there will be marginal areas of grassland that are retained and managed for biodiversity, including seeding with meadow grassland seed mixture and a reduced mowing intensity. Whilst the proposed mitigations are welcomed, the Trust is concerned that the report appears only to commit to **seek** biodiversity gain through appropriate landscape planting and habitat creation. The NPPF states that development should **secure measurable** net gains for biodiversity. As with the hedgerow habitat, the development must show that there has been a biodiversity net gain for habitats. The score for the existing habitat needs to be presented and compared with the metric score after development. The metric data needs to be presented to show the BNG increase, which should aspire to provide a 10% increase in BNG. The Environment Bill now makes it a legal requirement to secure 10% net gain, although we accept that the application predates the bill.

The Trust notes that the desk top search for species indicated that Curlew, Lapwing, Reed Bunting and Brown Hare, all species of Principle Importance, have been recorded in the area. The search does not however show if these species have been recorded within the site boundary. The ecology report indicates that no ground nesting birds were recorded during the site visits and we note the assessment of the field as being unsuitable for ground nesting birds. However, bird records we have do show that Lapwing have been recorded within the adjacent field, which probably has the same level of disturbance. We would therefore recommend a dedicated bird survey, taking in the immediate surroundings, so that a full understanding of potential impacts and mitigation required is known.

The Trust notes that no lighting will be required for the sports pitches, only for the car parking area. As outlined within the ecology report, these need to be of a type that reduces light pollution and avoids adversely affecting feeding bats.



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In conclusion, the Trust would recommend that a habitat management plan is provided that details and quantifies how BNG is to be delivered for the proposed development and should provide the metrics to show this increase. Our main concern would however be the protection of the SBI from pollution and run-off that might adversely affect the ecological interest of the wetland habitats. The expansion of the buffer zone and provision of swails is highly recommended. The Trust notes that the Greater Manchester Ecology Unit is a consultee and we would recommend that their views and thoughts on the development and on the requirements necessary to protect the SBI are sought and their advice followed.

Yours Faithfully



Martyn Walker
Conservation Officer for Greater Manchester

