

67658 – GMEU response

Summary

The developer's ecological consultant identified no significant ecological issues. Issues relating to bats, amphibians, nesting birds, invasive species, proximity to an SBI and watercourse and biodiversity enhancement measures can be resolved via condition and or informative.

Bats

No buildings or trees with potential bat roosting features are present on the site and bat foraging/commuting likely to be restricted to using linear features to reach the SBI where foraging habitat is of significantly higher value, these are primarily retained and the hedgerow that is to be lost the least structurally developed. I am therefore satisfied that the development in its current phase is very unlikely to impact on the conservation status of bats.

There is no mention of floodlighting and a statement that external lighting will be LED and on a time to prevent use prior to dawn and after dusk. There are therefore also no likely indirect impacts. Any future phases that may propose floodlighting should however be required to provide bat activity surveys. ***No further information or measures are however required at this time with regards to bats.***

Great Crested Newts

I am aware that great crested newts are very unlikely to be present in this area, with ponds and lodges surveyed previously and sufficiently isolated from known metapopulations at Coggra Fold and Darcey Lever to make colonisation extremely unlikely. I therefore feel that the reasonable avoidance measure recommended by the consultants because of difficulties in surveying the mill pond that is not fished is unnecessary. ***No further information or measures are required.***

Nesting Birds

The central hedgerow will be lost as well as a section of hedgerow along Radcliffe Moor Rd to enhance access, potential bird nesting habitat. There is also a chance that ground nesting birds such as lapwing use the fields. All British birds nests and eggs (with certain limited exceptions) are protected by Section 1 of the Wildlife & Countryside Act 1981, as amended. I recommend a condition along the following lines be applied to any permission.

No works to trees, shrubs or hedgerow occur or earthworks commence between the 1st March and 31st August in any year unless a detailed bird nest survey by a suitably experienced ecologist has been carried out immediately prior to clearance and written confirmation provided that no active bird nests are present which has been agreed in writing by the LPA.

Invasive Species

Japanese knotweed and himalayan balsam are present along boundaries of the site. Both species are included within schedule 9 part 2 of the Wildlife & Countryside Act 1981, as amended. It is an offence to introduce or cause to grow wild either of these plants. Both would appear to be largely avoidable given the boundary hedges where both plants occur are to be retained, however earthworks for pitch 3 do appear to encroach on the hedgerow, with the roots of japanese knotweed potentially extending in to the zone of the earthworks and similarly seed from balsam potentially impacted upon.

As long as no spoil is taken off-site however there is unlikely to be an offence but I would still advise that a method statement/biosecurity protocol is in place prior to any earthworks I recommend a condition along the following lines is applied to any permission.

Prior to any earthworks a method statement detailing biosecurity measures for himalayan balsam and japanese knotweed should be supplied to and agreed in writing to the LPA. The agreed method statement shall be adhered to and implemented in full unless otherwise agreed in writing by the LPA.

Protection of Bradley Fold SBI and Blackshaw Brook

The site drains towards Bradley Fold SBI. I note that following pre-app comments they are proposing to discharge primarily to Blackshaw Brook though some drainage is still potentially towards the SBI via a swale. Whilst I have no issues in principle, measures will be required to ensure any surface water draining in to either the Brook or the mill ponds is the same or better in terms of nutrient levels pollutants and discharge volumes to ensure no negative impacts occur on either waterbody both during construction and once the site is operational (if permission is granted). The Council needs to be satisfied that sufficient measures will be put place prior to granting permission, though I am happy for the final detail to be conditioned once those assurances have been received along the following lines.

No earth moving shall take place or material or machinery brought on site until a method statement to protect the ponds at Bradley Fold and the Blackshaw Brook from accidental spillages, dust and debris has been supplied to and agreed by the LPA. All measure will be implemented and maintained for the duration of the construction period in accordance with the approved details.

And

No development shall take place until it can be demonstrated that there will be no negative impacts on the ecological potential of the ponds at Bradley Fold and Blackshaw Brook resulting from the disposal of surface water post-development submitted to and approved in writing by the Local Planning Authority. The details, as approved, shall be implemented in full in accordance with a timetable which has first been agreed in writing by the Local Planning Authority.

Contributing to and Enhancing the Natural Environment

Section 170 of the NPPF 2019 states that the planning policies and decisions should contribute to and enhance the natural and local environment. The development will result in the loss of a small part of the low ecological value grassland to hardstanding and buildings and around 90m of hedgerow to low value grassland. Tree and shrub planting are proposed around the boundaries of the site and there are significant areas of grassland that will not form part of the football pitches currently proposed as amenity grassland with annual cuts. I am therefore happy that adequate mitigation can be achieved on site but that more should be provided. Mitigation for loss of bird nesting habitat should also be provided. I therefore have the following recommendations.

The areas currently proposed as amenity grassland with annual cuts is changed to wildflower grassland (lowland meadow mix) with an annual cut. I also recommend some minor amendments to the tree and shrub planting, so that all species planted are locally native and appropriate to the local landscape. Eg hedgerows should all be hawthorn, given it is a hawthorn hedge that is being lost. I am happy for ornamental planting around the car park and club house but recommend maximisation of wildlife attracting species. ***The details can be conditioned.***

Ecologist

Planning

Planning and Transportation

Place