

Date: 30th May 2024

FAO: Helen Ashworth

Planning Application No: LCC/2024/0008

Location: Lytham Green Drive Golf Club, Ballam Road, Lytham St Annes

District: Fylde

Proposals: Realignment, reprofiling and improvements to the 4th hole area through the importation of inert material, drainage infrastructure, levels changes, highways works and landscaping.

Ecological Comments

I originally commented on this application on the 7th May 2024 (Ref: LCC 2024 0008 – Ecology Response April 2024). The applicant has since provided a written response to my comments (Ref: Response to LCC Ecology Comments).

I reserve detailed comments for after receipt of updated documentation from the applicant reflecting my original comments, however there are a number of points raised in the applicants response which I would like to address at this time. I have listed the relevant comment and my response below.

- *The Arboricultural report and PEA identify a number of individual trees on site which have not been taken account of within the statutory metric. **They have. No change.***

There is no row in the statutory metric provided for 'Individual Trees' and no condition sheet covering each of the individual trees on site within Appendix D (Habitat Condition Assessments) of the PEA. The Arboricultural Impact Assessment (Ref: 2419) identifies the following individual and groups of trees on site: T5, T6, T10, T11, T12, G4 and G13. It also identifies a number of self set trees which, where the Diameter at Breast Height (DBH) is above 7.5cm should also be included as individual trees.

I would expect these trees, and any others identified on site, to be included within the metric at the correct size, based on the DBH of each tree and with their assessed condition. For example, tree T5 has a maximum DBH of 1000mm and would be classed as a large tree.

- *A suitably detailed methodology for calculating the condition assessments on site has not been provided. In particular, where a number of species per m2 is required, the applicant should provide detail on how this was calculated including any relevant quadrat information and supporting photographs. **Used the standard guidelines as stated. Not sure what additional is required.***
- *Data on the species present within individual habitats included within the PEA is not considered sufficient to inform the BNG condition assessments, for example the grass on site (under section 4.2.5 and 4.2.6) is identified only to genus level as 'meadow grass*

species'. Assuming this refers to a Poa species, there are many species within this genus and it is not clear how many of these are present on site and hence how the condition assessment criteria should be scored. Similarly dock species on site are only identified to genus. The species present on site should be clarified through site survey within the appropriate survey period or, where this is not feasible, grassland condition criteria A should be considered to be achieved. Species lists have been provided within the PEA which are used to inform condition assessment. This is unnecessary and it has been concluded that all habitats on site have been appropriately categorised and condition scored. No change.

The above comments are relevant to condition assessment criteria where a specific number of species are required to achieve a pass or fail. For example, criteria A of the grassland (low distinctiveness) condition assessment sheet which states that "*There are 6-8 vascular plant species per m² present, including at least 2 forbs ...*". Without this information I will be unable to determine if this criteria has been correctly passed/failed.

In addition, where the applicant has only included Poa or dock within their species list it is not clear how many individual species of this type are included within the grassland. If for example 2 or 3 Poa species were located within the grassland sward this could change the average number of species and may alter whether the criteria are passed or failed.

I trust you find the above comments useful.

Yours Sincerely

Ian Holland
Senior Ecologist
Environment & Climate Service
Lancashire County Council