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Subject	Ecology comments: Application no.	Project Name	LCC Ecology Advice
	LCC/2021/0007		
Attention	Rob Hope	Project No.	B2327FE3
From	██████████		
Date	03/03/2021		

APPLICATION: LCC/2021/0007 LAND NORTH OF A674 MILLENNIUM WAY, NORTHEAST OF M61 JUNCTION 8

THE EXTRACTION OF SAND AND GRAVEL AND RESTORATION WITH IMPORTED INERT WASTE ON LAND TO THE NORTH EAST SIDE OF JUNCTION 8 OF THE M61, GALE MOSS, CHORLEY.

LOCATION: LAND ADJOINING THE A582 AND B5253 HIGHWAYS FROM A582 BROAD OAK ROUNDABOUT, PENWORTHAM TO STANIFIELD LANE/WATKIN LANE ROUNDABOUT, LOSTOCK HALL AND THE B5253 FROM FLENSBURG WAY ROUNDABOUT FARINGTON TO LONGMEANYGATE JUNCTION, LEYLAND, LANCASHIRE.

The ecological response provided has been based on a review of the submitted information relating to biodiversity and ecology for the above application and accessed through the planning portal February 2021. The following documents submitted to support the application and reviewed as part of this consultation response are listed below:

- 305-2 R1.3 Supporting Statement, containing:
 - Preliminary Ecological Appraisal Report Land off Millennium Way, Chorley
 - Bat Activity Survey Land off Millennium Way, Chorley
 - Flood Risk Assessment
- Landscape and Visual Statement
- 305_2 Gale Moss Location Plan V2
- 305_2 Gale Moss Phased Scheme of Working
- 15.01.2021 Amended (3) 305_2 Layout and Bunds Plan V2 (1)
- 15.01.2021 Amended (8) 305_2 Gale Moss Restoration Plan A V2
- 15.01.2021 Amended (9) 305_2 Gale Moss Restoration Plan B V2

Summary

The ecology surveys carried out to inform the application have been undertaken by suitably qualified ecologists and to appropriate standards however it is considered that further surveys are required. The surveys undertaken did not extend to the full application boundary, omitting the north-west corner of the site (where no extraction works are proposed). The north-west corner of the site, known as "Gale

Moss", is described as a peaty area with hydrological links to the application boundary. There has been no assessment of the impact of the proposed extraction on this area. It is recommended that a habitat survey of Gale Moss be undertaken, and that an assessment of the impacts the alterations to the hydrological links to the area will be have be made. There should also be an assessment made as to the risk of the peat drying out and the implications this may have for carbon storage. This may require consultation with water environment specialists.

Biodiversity Units for the works area have been calculated however as the works area does not extend to the full application area these should be recalculated following survey of Gale Moss and a report detailing the biodiversity net change for the whole application boundary should be produced once detailed landscape proposals are available.

The application area lies within a Site of Special Scientific Interest (SSSI) Impact Risk Zone with the LPA required to carry out a consultation Natural England.

Further survey for birds in relation to the Gale Moss area is also required, to determine if the area is important for ground nesting or over-wintering bird species.

The Preliminary Ecological Appraisal (PEA) does not include assessment of impacts resulting from permanent diversion of a ditch within the site. The proposed habitat mitigation, compensation and enhancement measures outlined therefore also do not include sufficient consideration of ditch habitats. Additional measures required to avoid significant effects on protected and notable habitats and species have been included in the response below.

Numbered recommendations regarding the proposed scheme are outlined in the PEA. Recommendation 3 within the PEA requires production of a Construction Environmental Management Plan (CEMP) which should detail how the site will be remediated and built without affecting surrounding habitats, as well as protection measures for protected species and invasive species. Additional detail as to what species and measures the CEMP should cover have been included in the response below. The CEMP should be developed by / in consultation with the consultant ecologists and appointed contractors. The submission of this document should be ***secured as part of any planning permission and the document should be reviewed and approved before works commencing.***

Recommendation 4 requires an updated water vole survey be carried out prior to works commencing. Recommendation 5 recommends production of Biodiversity management Plan, R6 requires standard provisions to avoid impacts to nesting birds and R7 suggests an Invasive Non-Native Species (INNS) management plan be produced. These should be ***secured as part of any planning permission.***

Statutory Designated Sites

The PEA Report found no nationally designated sites within 2km and no internationally designated sites within 10km. The report found that the site lies within the SSSI Impact Risk Zone of the West Pennine Moors SSSI but stated that the proposed development did not fall into any of the necessary categories that require consultation. These are:

- Airports, helipads, and other aviation proposals
- Planning applications for quarries, including: new proposals, Review of Minerals Permission (ROMP), extensions, variations to conditions etc. Oil and gas exploration/extraction
- Livestock and poultry units with floorspace > 500m²

The application for extraction of sand and gravel would therefore require the LPA to consult with Natural England on the likely risks to the SSSI.

Non-Statutory Designated Sites

There are five Lancashire Biological Heritage Sites (BHS) within 2km of the proposed development. The closest BHS is Tan House Valley which lies around 500m east. The report found that due to distance and separation no impacts to the above sites would result. The assessment has concluded no likely impacts on any non-statutory sites. The findings of the assessment are acceptable.

Habitats

Aquatic Habitats

One of the ditches within the site will be permanently diverted, and another will be partially culverted. The ditches were identified as being the most ecologically valuable habitat on site. The PEA assumes that both ditches are retained and therefore offers no comment on the impact of the permanent diversion of the ditch running north-south through the site.

If LCC are minded to approve this application, it is recommended it be stipulated that plants and sediment from the section of ditch that is to be diverted be translocated to the new ditch to speed up establishment of aquatic habitats. Material from the lost ditch could also be placed adjacent to the retained ditch to allow any invertebrates to re-enter the watercourse. The retained ditch should be protected from pollution with appropriate stand offs maintained. Once the site is restored the PEA recommends wider buffer strips be incorporated around the ditches to be managed sympathetically to encourage flora and protect them from agricultural run-off. This information can be integrated within a Construction Environmental Management Plan (CEMP). The submission of this document should be ***secured as part of any planning permission and reviewed and approved prior to works commencing.***

Terrestrial Habitats

The PEA outlines that the construction of the scheme would result in direct, temporary and permanent losses of the terrestrial habitats recorded. This includes the loss of modified grassland, neutral grassland (other) and mixed shrubs. These habitats are of limited value and therefore loss is not considered to be of significance beyond the site level. These conclusions are considered appropriate.

The PEA did not include survey of the area known as "Gale Moss" but notes that based on a brief view it appeared to support rank grassland rather than bog habitat but recommended "that plans should be drawn up to mitigate any drawn down of the water table to reduce the risk of impacting upon this area".

The Flood Risk Assessment (FRA) states that surface water in the drainage ditches flows north-west towards Gale Moss, which is also described as a "peaty area", and that the proposed operations would reduce the volume of surface water run-off away from the site. Proper assessment of the habitats within Gale Moss and assessment of impact to Gale Moss is therefore recommended. The value of Gale Moss carbon storage should be assessed, and a hydrology assessment should determine if the proposed extraction will lead to the peat drying out. This may require consultation with a water environment specialist.

The PEA uses Biodiversity Metric 2.0 to calculate the baseline biodiversity units of the site. The application boundary, however, was not used as part of this calculation, the works area boundary was. Without survey of the Gale Moss area and confirmation that habitats will not be adversely affected by changes in water flow resulting from the proposed development, it is not considered that an accurate accounting of the biodiversity units of the whole site has been ascertained, and it would also not be possible to calculate habitat loss/gain.

It is proposed that wildflower planting be carried out in the northern section of the works area boundary, and infill tree planting and maintenance be carried out the west of the site. No details regarding species or provenance was provided. A review of aerial imagery suggests that the grassland within the northern section of the works area may have at one time been marshy in nature. It is therefore recommended that an appropriate marshy grassland wildflower mix of UK provenance be used for seeding of this area. No species were suggested for the tree planting areas. It is recommended the fruiting and flowering native UK tree species are selected. A report detailing full calculation of biodiversity loss/gain should be submitted once habitats within the full application boundary have been surveyed and landscape plans developed. This should be ***secured as part of any planning permission***

It is recommended that a detailed management and maintenance plan be produced for the long-term maintenance and protection of the proposed habitats and to ensure their successful establishment for a period of no less than 5 years. A biodiversity net gain assessment should be carried out for the full application area, and once impacts to Gale Moss are known. This document should also set out long-term management and protection of the proposed new habitats. This information should be submitted in writing and should be ***secured as part of any planning permission***.

Species

Bats

Bat surveys undertaken for the scheme identified low levels of foraging and commuting activity by common pipistrelle, soprano pipistrelle, and Brandt's/whiskered bat. No roosts were recorded for these species.

The site was therefore assessed as not being of significant importance to bats. This is considered an acceptable conclusion. The bat activity report recommends that a sensitive lighting scheme be designed to limit light spill onto surrounding habitats and that bat boxes be installed around the site, particularly along the eastern boundary. This should be ***secured as part of any planning permission***

Birds

The desk study was limited to data obtained from Lancashire Environmental Record Network. Site habitats were assessed as being unlikely to support key or otherwise notable bird species. The assessment did not include habitats within Gale Moss, which may support habitats suitable for overwintering or ground nesting birds. Further survey of the area within Gale Moss is recommended to determine its importance for birds and to determine impacts to birds within this area.

Measures to protect nesting birds are outlined in the PEA Conclusions and Recommendations section. The requirements to protect nesting birds should be set out in the CEMP. This should be ***secured as part of any planning permission***

Amphibians

Surveys undertaken in 2017 identified an absence of great crested newts (GCN). The PEA suggests that due to external barriers to GCN movement onto the site and the nearby pond (M61 on western boundary, A road on southern boundary, Leeds-Liverpool Canal eastern boundary and B road to north) this survey finding remains relevant. This is considered to be an acceptable conclusion. No further action in relation to GCN is required. The PEA notes that frog and smooth newt were recorded during surveys undertaken in 2017 but does not identify where they were recorded. The ditches within the site provide suitable habitat for these species. It is recommended that measures to protect these species during site clearance are detailed in a CEMP. This document can be **secured as part of the planning permission**.

Otter

No evidence of otter was recorded during site surveys. It is concluded that otter may pass the site along the Leeds-Liverpool Canal from time to time but are not using site habitats. No mitigation to otter is suggested. It is recommended that it be required that the lighting design for the scheme should ensure no light-spill onto the canal corridor to maintain it as commuting/foraging route for otter. This can be **secured as part of the planning permission**.

Water Vole

Water vole surveys of the ditches within the works area were carried out and found no evidence of water vole. The PEA recommends a pre-commencement water vole survey of the ditches to ensure the species is still absent from the area. This is considered to be an adequate recommendation and the requirement can be **secured as part of the planning permission**.

Badger

No badger signs were recorded during the survey. It is concluded that the risk of badger presence at the site is low and no further survey for the species is recommended. This is considered to be an adequate conclusion.

Hedgehog

Hedgehog presence is assumed but no detailed measures to protect the species are outlined. Measures to protect hedgehog should be included within the CEMP and this document can be **secured as part of the planning permission**

Reptiles

The open grassland within the works area was assessed as being of low suitability for reptiles and no further surveys were recommended. No mitigation regarding reptiles is specified beyond the CEMP to protect protected species. Given the presence of ditches with less managed neutral grassland around them it is considered that some suitable habitat is present but it is limited in extent and surrounded by largely unsuitable habitat. Precautionary methods of working in regards to safeguarding reptiles should be detailed in the CEMP and the requirement can be **secured as part of the planning permission**.

White-Clawed Crayfish

Based on a lack of desk study records and lack of suitable habitat within the ditches white-clawed crayfish were not considered to be present or at risk from the development activities. This is an acceptable conclusion.

Invasive Species

INNS were recorded on the eastern boundary of the scheme. An appropriate management strategy should be implemented which would set out appropriate construction, handling, treatment and disposal procedures to prevent the spread of INNS in line with recognised good practice. The strategy should be included within the CEMP and this document can be ***secured as part of the planning permission.***