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| Subject | Ecology comments: Application no. LCC/2021/0007 | Project Name | LCC Ecology Advice |
| Attention | Rob Hope | Project No. | B2327FE3 |
| From | ██████████ | | |
| Date | 23/09/22 | | |

APPLICATION: LCC/2021/0007

THE EXTRACTION OF SAND/GRAVEL AND SUBSEQUENT RESTORATION WITH INERT ENGINEERING FILL TO FACILITATE A PLATFORM FOR EMPLOYMENT DEVELOPMENT, OR AGRICULTURE, WITH PERIPHERAL LANDSCAPING

LOCATION: LAND NORTH OF A4674 MILLENNIUM WAY, NORTHEAST OF M61 JUNCTION 8. GR: 358909 419837

The response provided below is based on a review of the updated/additional relevant information submitted for the above application in terms of ecology and biodiversity. This was accessed through the planning portal on 21st September 2022 and has been assessed in the light of the original ecology consultation response provided on 3rd March 2021, which should be referred to in addition to this current response; the original response requested additional information to be provided as *part of the planning application* as summarised below:

- It was recommended that a habitat survey of the area of Gale Moss within the red line boundary be undertaken, and that an assessment of the impacts the alterations to the hydrological links to the area to be made, including the risk of peat drying out and the implications of this.
- Baseline Biodiversity Units for the existing site were calculated in the original submission using Natural England's Biodiversity Metric 2.0, however this did not extend to the full application area and should be recalculated following the habitat survey of Gale Moss. This would allow for a full report detailing the biodiversity net change for the whole application boundary to be produced once detailed landscape proposals are available.
- Further survey for birds in relation to the Gale Moss area were requested, to determine if the area is important for ground nesting or over-wintering bird species and the impact of the works on these.
- Further information on the proposed habitat mitigation, compensation and enhancement measures was requested with regard to ditch habitats, in particular the ditch proposed for realignment.

The following documents submitted to support the application and reviewed as part of this consultation response are listed below:

- 04.08.2022 305-2 R2.3 Amended Supporting Statement
- Hydrogeological Impact Assessment (August 2022)

- 305_2 Gale Moss Location Plan V2.2
- 305_2 Gale Moss Site Plan V2.2
- 22.03.2022 Amended (8) 305_2 Gale Moss Restoration Plan A V3
- 29.04.2022 Amended (9) 305_2 Gale Moss Restoration Plan B V3
- 3_Total_Excavation_A2_DWG_Sheet_(rev A) MPG EDITS

Impacts to Gale Moss

No additional ecology survey information has been submitted with the updated application and no habitat survey of the area of Gale Moss within the red line boundary has been undertaken as recommended in the original consultation response.

Notwithstanding the above, a hydrogeological impact assessment (Hafren Water, 2022) has been undertaken to assess the potential impacts of the proposed mineral extraction on Gale Moss. The assessment concluded that Gale Moss has been affected significantly over a prolonged period due to the presence of drains and ditches, leading to desiccation of the peat, as well as the presence of the M61 motorway adjacent to the west, leading to direct and indirect effects. The report states that mineral extraction would be above the water table, as well as Gale Moss being upstream of the application area and therefore limited potential for impact. The assessment concludes that the proposed mineral extraction would not impact Gale Moss in terms of hydrology and that no mitigation is required. This hydrogeological impact assessment satisfies the initial concerns outlined regarding potential hydrological impacts upon Gale Moss.

Biodiversity Net Gain (BNG)

While the hydrogeological impact assessment is welcomed, a **habitat survey of the area of Gale Moss within the red line boundary is still required to inform the baseline biodiversity units of the *whole application site***. This is required to inform the biodiversity unit net change for the *whole application boundary* as recommended in the original consultation response.

While it is appreciated that this application is connected to a separate outline approved application for industrial development (ref: 17/00713/OUTMAJ), Section 7 of the supporting statement describes a restoration scheme in the event that the industrial development does not come into fruition. Paragraph 7.1.2 (in addition to paragraph 3.2.6) states that the restoration scheme aims to provide BNG, and Section 7.3 describes the broad landscape proposals including a 'wildflower meadow' and 'woodland boundary'. Despite this, there is no *quantitative evidence* that BNG can be achieved should these restoration plans be implemented.

A biodiversity metric calculation should therefore be undertaken (including *all habitats* within the red line boundary) based on these restoration proposals to show that BNG is possible in principle should the industrial development not be implemented; this should be accompanied by a BNG technical note. Furthermore, as outlined in the original consultation response, the baseline of this metric calculation should form the baseline of the industrial development once designs and layouts/detailed landscape designs are available. It is also recommended that the most up to date version of the biodiversity metric is used (currently version 3.1 at the time of writing).

Birds on Gale Moss

No further survey for birds in relation to the Gale Moss area (as recommended in the original consultation response) has been undertaken. While it is appreciated that there is unlikely to be any direct hydrological impacts on Gale Moss, **it is considered that an assessment of this area for the potential for ground nesting/overwintering birds and disturbance impacts should still be undertaken as part of this planning application.**

Ditches

The original supporting statement (1/12/20) referred to a permanent ditch diversion (of the ditch that flows south to north), which was not adequately addressed in terms of ecological impacts. However, paragraph 2.4.2 of the amended supporting statement now states that this ditch will be unaffected which satisfies the original concerns. As described in the original consultation response, protection measures for these ditches should be included in the Construction Environmental Management Plan and enhancement measures should be considered as part of the BNG approach.