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**Ecological Consultants
Environmental and Rural Chartered Surveyors**

Your Ref: LCC/2022/0044

Our Ref: AWG/7444

Mr Robert Hope
PO Box 78
County Hall
Fishergate
Preston
PR1 8XJ

Monday, 07 November 2022

Dear Mr Hope

RE: LCC/2022/0044 CUERDEN STRATEGIC SITE, EAST OF STANIFIELD LANE, NORTH OF CLAYTON FARM, WEST OF WIGAN ROAD, LOSTOCK HALL- ECOLOGY

Further to the request for additional information received from the councils' ecological advisors, Jacobs, dated 14th October 2022 as well as queries raised by other consultees. We would hereby provide the information requested.

Assessment methodology- We can confirm surveys were undertaken in accordance with CIEEM EcIA guidelines which were current at the time each report was compiled.

Additional survey- The application is outline form with most matters reserved. The timing of construction work and layout of the development for futures phases being unknown at this time. In line with the Chartered Institute of Ecology and Environmental Management (CIEEM) we would consider the findings and recommendations of the submitted ecological information to be valid for 18months.

Between 18 months and 3 years, a professional ecologist will need to undertake a site visit and may also need to update desk study information (effectively updating the Preliminary Ecological Appraisal) and then review the validity of the reports. Some or all of the other ecological surveys may need to be updated. The professional ecologist will need to issue a clear statement, with appropriate justification, on:

- The validity of the report;
- Which, if any, of the surveys need to be updated; and
- The appropriate scope, timing and methods for the update survey(s).



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The likelihood of surveys needing to be updated increases with time, and is greater for mobile species or in circumstances where the habitat or its management has changed significantly since the surveys were undertaken.

More than 3 years, the ecological information is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated (subject to an assessment by a professional ecologist, as described above).

Bat survey data- Surveys were undertaken on 2nd and 25th May 2022 as reported within the submitted ES. Additional transect surveys were undertaken on 27th June and 29th August 2022. Surveys in June and August were extended to 2 hours after sunset due to lighter nights which allowed safer access to the site.

As was consistently recorded by Simply Ecology (2012) and Simply Ecology (2017) and in the previously submitted survey information regular and consistent patterns of bat activity were recorded within the site. The surveys detected bats consistently using the site all through the night. Small numbers of common pipistrelle, usually 1 or 2 bats at most, were found making prolonged use of hedgerow, pond and tree-line features on the site. In 2022 the duration of manual surveys was considered sufficient in duration, seasonal and inter-year spread to record a representative sample of bat activity in accordance with Bat Surveys for Professional Ecologists- Good Practice Guidelines (2016, 3rd Ed).

Anabats were deployed between 25th May and 6th June 2022 in three locations, Figure 1. These were judged as being higher quality commuting/ foraging areas. Location 1 and 2 were within hedge lines with mature trees. Location 3 was adjacent an infield pond and scrub. Analysis was undertaken using KALEIDOSCOPE 4.0.1 and Bats of Europe 3.1.3 S/A:+1. Calls were not then manually filtered to avoid surveyor bias, Table 1, 2 and 3.

Anabats at Locations 1 and 3 recorded bat activity by Pipistrelle Sp and Noctule as is consistent with recorded activity during the manual surveys. The recordings classified as Nathusis Pipistrelle are likely attributed to a downward shift in the echolocation frequency of Common Pipistrelle associated with flight between a more cluttered environment along the hedgeline and open grassland adjacent. Noctule passes were occasional.

The Anabat at location 2 recorded occasional passes by Myotis Sp (Brandt's (*Myotis brandtii*), Daubenton's (*Myotis daubentonii*) and Natterer's (*Myotis nattereri*). This is also consistent with the manual surveys and again classification beyond "Myotis Sp." is not really possible, but is attempted by the software, due to the recordings being made on the edge of a cluttered environment where echolocation calls would be shifted as bats pass from the tree line to open grassland and due to call attenuation from vegetation.

Overall it is considered the classification of the number and species of bats at the site and the impacts from development have been adequately determined. The additional survey information presented is consistent with that already made available.

Table 1- Anabat Location 1							
KALEIDOSCOPE 4.0.1							
Bats of Europe 3.1.3 S/A:+1	MYBR	MYDAU	MYNA	NYNO	PINA	PIPI	PIPY
*				1	35	2879	1
20220525					6	139	
20220526					13	375	
20220527				1	11	125	
20220528					1	52	
20220529						13	
20220530						1	
20220531					1	12	
20220601					2	13	
20220602						28	
20220603					1	1133	
20220604						968	1
20220605						5	
20220606						15	

Table 2- Anabat Location 2							
KALEIDOSCOPE 4.0.1							
Bats of Europe 3.1.3 S/A:+1	MYBR	MYDAU	MYNA	NYNO	PINA	PIPI	PIPY
*	48	2	20	6	1	348	7
20220525			1	1		33	
20220526			1			13	
20220527			1	1		4	
20220528	1					15	
20220529	1		1			63	
20220531					1	7	
20220601	4		1			87	2
20220602	34	2	6			104	5
20220603						1	
20220604			1	2		14	
20220605	6		5	1		1	
20220606	2		3	1		6	

Table 3- Anabat Location 3								
KALEIDOSCOPE 4.0.1								
Bats of Europe 3.1.3		MYBR	MYDAU	MYNA	NYNO	PINA	PIPI	PIPY
S/A:+1								
	*				23	3	10	
	20220525				6			
	20220526				3	1	2	
	20220527							
	20220528						2	
	20220529				2		1	
	20220530				3			
	20220531					1		
	20220601				6		2	
	20220602						3	
	20220603							
	20220604							
	20220605				3			
	20220606					1		



- D Boundary
- Anabats

Figure 1
Anabat Locations

A

BNG - Condition assessment sheets for habitats were included in the original BNG report in the appendix. We have retabulated these in the same format as that used for hedgerow categorisation and re-issued the BNG report. These tables include cross reference between the Phase 1 survey habitat classification and BNG habitat classification as per UK Habitat classification.

All hedges both within and to the site boundary were included within the calculations.

The Biodiversity Metric 3.1 calculation spreadsheet was submitted with the planning application but its file format is not compatible with councils online planning portal. It can be provided directly to the council's ecological advisors if required.

Trading rules are satisfied for Low and High distinctiveness habitat areas. Trading rules are not satisfied for moderate distinctiveness habitat areas. There is a deficit for scrub and for woodland.

This is equivalent to 1Ha of broadleaf woodland in moderate condition or 0.6Ha of mixed scrub in moderate condition.

Only one phase of development has been submitted with a full landscaping plan. Later phases of development are outline only. The later phases of development are in excess of 1Ha and as such additional landscaping including woodland and scrub can be provided within them, if required, as each phase is brought forward.

The calculations presented at this stage of the application do not account for habitat banking. That is to say that the significant infrastructure landscaping which is proposed, will result in a surplus in units over the initial phase of development and will also appreciate in value before the later phases are brought forward. Calculations presented are based on the habitat value at Year 0, rather than at a higher value, when later phases of development are brought forward.

It should be noted that woodland and scrub which has been previously cleared, and calculated in the BNG scores retrospectively, for the current proposal, was lost prior to 30th January 2020. When BNG becomes mandatory under the Environment Act, the loss of woodland and scrub prior this date would not be factored into the score. The client has however decided to try and use pre-clearance values as a target for the current scheme, these being higher than those which occur should post 2020 habitat values be used.

Overall we consider the later phases of development which remain in outline, more than provide sufficient scope for provision of the required BNG and habitat types.

During the construction phase, management of habitat areas will be the responsibility of the developer. Once handover has been achieved habitat areas will be the responsibility of a management company, setup and run by the site users. This management company will be ultimately responsible for management and funding of the habitat areas via a service charge. Monitoring of the habitat areas will be undertaken by a third-party ecological contractor to be appointed by the management company. It is envisaged monitoring will be undertaken in Yr1, Yr2, Yr3, Yr5, Yr10 and every 5 years thereafter. Habitat areas will be assessed against the pre-development target condition scores. Reports on habitat condition and actions required to achieve target condition will be provided to the Local Authority.

Birds- Bird surveys were undertaken on the following days and times. Surveys were commenced at dawn and continued until late afternoon. Surveys comprised a walked transect of the entire site so that all areas were approached within 100m. The surveyor also used fixed vantage points, in concealed locations, to watch for bird activity which may be altered as a result of the walked transect.

30th April 2022 0610 - 1850. SSE2 Sunny dry

16th May 2022 0525 - 1900. WSW2/3. Scattered showers

30th May 2022 0505 - 2015 - WNW 2/3. broken cloud, sunny intervals

12th June 2022 0455 - 1935. W3/4. Scattered cloud, dry

299 registrations of birds displaying breeding behaviour were recorded for 27 species, Table 3. 11 species were recorded flying over or on feeding but not showing signs of breeding, Table 4.

Greenfinch	Red	Carrion Crow	Green
Mistle Thrush	Red	Chiffchaff	Green
Dunnock	Amber	Chaffinch	Green
Reed Bunting	Amber	Collared Dove	Green
Sparrowhawk	Amber	Coal Tit	Green
Song Thrush	Amber	Goldfinch	Green
Whitethroat	Amber	Great Tit	Green
Wren	Amber	Jay	Green
Willow Warbler	Amber	Long-tailed Tit	Green
Kestrel	Amber	Magpie	Green
Bull Finch	Amber	Woodpigeon	Green
Blackcap	Green	Robin	Green
Blue Tit	Green	Blackbird	Green
Buzzard	Green		

Table 3- Breeding birds on site and BoCC classification

House sparrow	Red
Starling	Red
Swallow	Green
House Martin	Red
Swift	Red
Herring Gull	Red
Black-headed gull	Amber
Lesser black-backed gull	Amber
Mallard	Green
Oystercatcher	Amber
Lapwing	Red

Table 4- Non-breeding birds on site and BoCC classification

The number of bird species recorded breeding on site was significantly lower than previously recorded in Simply Ecology (2012) and Simply Ecology (2017). This may be due to some significant changes in habitats on site including loss of woodland, ponds and some hedgerow.

Red listed species Greenfinch and Mistle Thrush occur on site. Amber listed species, Dunnock, Reed Bunting, Sparrowhawk, Song Thrush, Whitethroat, Wren, Willow Warbler, Kestrel and Bull Finch were also recorded.

These species are generalists and the proposal would likely result in an adaptation to different habitats on site rather than complete displacement. It is notable that the location bird registrations were made are from the boundary trees and scrub rather than central grassland areas, Figure 2.

Of those species recorded breeding only Buzzard, which is green listed, is unlikely to breed on site post development.

It should be noted that the purpose of BNG is to create similar habitat of higher value post than predevelopment. As this scheme can deliver a BNG, this should in theory, result in enhancement of the site for the same bird species as occur on site pre-development. In practice we would still expect a shift in the breeding bird assemblage on site. Species such as House Sparrow and Starling recorded on site as not breeding may start breeding as a result of the provision of new nesting sites.

It is also likely the carrying capacity in respect of foraging on the site would be initially reduced due to an increase in non-vegetated areas and disturbance. As habitat areas establish, it is envisaged the carrying capacity of the site would increase.

Additional enhancement of the site can be provided with the provision of bird nest boxes in retained trees. Overall we consider the impacts predicted in the already submitted ES in respect of birds remain valid.

Wintering bird surveys were not undertaken of the site for the previous, consented application. Whilst visits were undertaken in winter 2021/22 no surveys have been formally undertaken as the site was not considered to support habitat suitable for use by notable overwintering bird species.

Habitats Regulations Assessment- The Site is 9.1 km from a Special Protection Area and Ramsar site designated for overwintering birds. The site does not support habitat likely to be used by birds associated with the SPA/ Ramsar site and is outside the area mapped as being regularly used by these species. HRA was not undertaken for the previous consented application and no impact pathways from the current site to the SPA/ Ramsar site have been identified.

Management Plans e.g. Construction Environmental Management Plan or Biodiversity Management and Monitoring Plan- Until the timing and extent of work is known, preparation of these plans is not possible. It would be usual for these to form a pre-start planning condition.



D Site Boundary

Figure 2
Breeding Bird Survey
breeding sites



enviriotech

Yours Sincerely



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