

Iain

Following the recent meeting (20 October 2020) with Claire and the team for this development, it was agreed I would summarise my preapplication feedback.

I have the following comments to make: -

Development Footprint & Survey Area

- A plan of the development area was kindly provided prior to the meeting (attached). I have subsequently received an indicative layout, but this does not add substantively to the nature of our meeting discussion.
- It appeared that the ecology team had not had sight of this prior to this time. The proposed development footprint should be used to inform the impact assessment and the proposed mitigation on the submission.
- There is a small area within the compound of HMP Wymott that has not been surveyed. I would recommend that this area is inspected and assessed within the submission.

The preapplication information

- The Report provided by ecologists Ramboll (Preliminary Ecological Appraisal, issue 1, 7th October 2020) has satisfactorily covered all the relevant survey and species groups.
- Several areas require further consideration; bats, water vole and amphibians (discussed below)
- The following groups in my view do not require further survey work prior to the submission, although further work may be required precommencement. These are: -
 - o Invertebrates – scoped out due to extent of development footprint
 - o Reptiles – scoped out due to extent of development footprint
 - o Otter – scoped out due to extent of development footprint
 - o Hazel dormouse – scoped out due to extent of development footprint
 - o Hedgehog – likely presence can be accommodated within the landscape design and
 - o Birds – scoped out of further wintering/breeding bird surveys. Normal site clearance protocols will need to be applied in relation to general wildlife protection of nesting birds.
 - o Badger sett – currently no activity within development footprint. However, precommencement surveys will be required prior to construction. Based on the available information this can be covered via condition.
 - o INNS (Invasive Non-Native Species) – an Eradication and Control Method Statement can ultimately be applied via condition.
- For the sake of transparency and completeness, any submission should include the results of the PEA surveys.

Scoping of further survey prior to determination

- It would be useful to have a discussion and reach agreement about the scope for additional surveys that are identified as being required. This should be undertaken at the earliest opportunity.
- The timescale of the proposed submission appears to be quite tight potentially as early as April 2021. This would not allow time for the necessary surveys to be undertaken prior to submission.
- It was made clear that the additional survey information on material considerations would need to be made available prior to determination. *How information is submitted to the Local Planning Authority during the application process is not one GMEU can comment on. The mechanism and agreement to this should be **confirmed** with the LPA.* However on the basis of the current

footprint and likely impacts, GMEU would be willing to agree to a programme of works over the survey season and for information to be presented during a determination period.

- The items that should inform any scoping discussion are: -
- Ponds and amphibians
 - The site supports a number of ponds and there are a large number of ponds in the wider site and in the surrounding area.
 - HSI (Habitat Suitability Index) assessment has been provided, which shows that all the ponds are above average suitability for great crested newt (European and UK protected species; Habitat Regulations 2017 and Wildlife & Countryside Act 1981).
 - It would be useful to receive a map identifying the ponds both on and off site. This would help to inform a discussion of the scope of the ponds requiring survey.
 - It is noted that DLL (District Level Licensing) is not currently operational in Lancashire.
 - The use of eDNA is an accepted technique and can be started as early as April according to NE guidance. I indicated that a degree of professional judgement is required in this start date in the north west of England depending on the late-winter early spring weather patterns. This is a matter that the Ramboll ecology team can advise on as the survey season approaches.
 - If positive eDNA results are returned there will be a need for a population assessment survey to be undertaken to inform mitigation via a conventional EPS (European Protected Species) Licence application.
- Ponds, ditches and water vole
 - I have not fully ascertained if the development footprint contains ponds, which would also be suitable for water vole.
 - A scoping survey discussion informed by the pond map and condition/connectivity of ponds or ditches to the wider area, will be able to assess if additional survey is required.
- Bats roosts and bat foraging
 - A known historic bat roost is within very close proximity to the footprint of the development and built structures occur within the development footprint.
 - It would appear that only activity surveys have currently been undertaken.
 - Given the proximity of the known roost to the site and the habitats/structures present I would advise that an internal inspection is undertaken along with the recommended activity surveys that might be required.
 - Any submission should provide details of mitigation, licence requirements along with a landscape scheme and lighting design which accommodate roost, roost potential and protection of foraging/commuting routes.

Biodiversity Net Gain and Landscape Design

- I am uncertain of the Planning Authority's current position in relation to the emerging Environment Bill and the 10% net gain requirements? This is a matter for policy direction *to be advised and confirmed by the LPA*.
- If BNG is a requirement of a submission then a Defra metric should be used to calculate this.
- The scheme should seek to achieve no net loss in biodiversity (NPPF Feb 2019) within the submitted scheme via the creation of new habitats to compensate for losses.
- The use of SuDS in the scheme is welcomed and it is recommended that this can also be used to provide permanently wet habitat features to the benefit of the wider landscape scheme and biodiversity.
- Outwith the question of BNG uplift, the scheme should provide appropriate enhancements via for example bat, bird and amphibian hibernacula installation and/or the management of other habitats on site. The management of Stanning's Folly by volunteers/or estate company was briefly mentioned.

Estate Management post construction

- If the LPA indicate that BNG is a policy requirement, then a management scheme should be provided and implemented for a 30 year period as emerging policy identifies.
- However, in any event the submission should include the commitment to produce and implement a LEMP for an agreed period of time. I suspect that the resourcing of any future estate management will fall to the applicant given the nature of the usage of the site.

I hope you find these comments helpful as a record of the discussion and how GMEU would suggest matters are addressed in any future planning submission. Claire Pegg is copied in so that she can circulate to her colleagues. If either of you have any queries, please do not hesitate to contact me. As I indicated to Claire, GMEU works on behalf of the Planning Authority so any dialogue will also be shared with Chorley Council.

I look forward to progressing a discussion on the scoping of additional survey work.

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