

Mr Derek Richardson
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Tameside Metropolitan Borough Council



Our Ref: CW20-144-LS-002

Your Ref: /

14th December 2022

CONSULTATION RESPONSE - ECOLOGY

LANDS WEST OF NEW STREET, LITTLEBOROUGH

Many thanks for your consultation response via email dated 14/12/2022 relating to Planning Application Ref 22/01039/FUL. Please see the below responses to your comments which I trust will alleviate any concerns.

The Ecology Survey Report seems to downplay the standing water features and wet grassland on the site. It is stated that the standing water results from a blocked culvert and that the site is now drying, with the implication that the feature is temporary in nature and of limited value. Ponds are not listed in the summary of the report as a notable habitat. In fact, I have known the site for a number of years and it has always been very wet, with areas of standing water variable in extent but often present. The presence of the standing water, and the areas of wet grassland, may be of value to wading and water birds, but surveys for these species has been limited. The adjacent development site supported snipe, lapwing, redshank and, on occasion, curlew and a water feature was created at the southern boundary of the site as compensation for the loss of wet grassland used by these species. The current application site is situated along the Roch corridor and these wet areas can provide refuges for upland waders during periods of bad weather. This level of transient use by birds can sometimes be difficult to record during one-off site surveys, but transient use of the site nevertheless can be important because without these refuge sites the conservation status of some important bird species can be harmed.

The area of pond was present when we undertook the baseline assessment of the site and the condition assessment for the Biodiversity Net Gain (BNG) Assessment, and as well to inform the Preliminary Ecological Assessment and recommendations. Three breeding bird surveys were undertaken on the site by Collington Winter Environmental Ltd in 2021 (Report RefCW20-144 R1). The survey identified 28 bird species within the site. These included three species under the Section 41 of the 2006 Natural Environment and Rural Communities (NERC) Act including starling (*Sturnus vulgaris*), dunnoek (*Prunella modularis*) and song thrush (*Turdus philomelos*). No bird species as listed in the response were identified during the survey, as such, these species are deemed likely absent from site though.

I note that it is planned to incorporate an attenuation basin at the southern boundary of the site. This could provide an alternative open water feature with associated wetland habitats, but only if the feature can be designed appropriately, to provide an area of standing open water for a significant part of the year. If the feature cannot be designed in this way, I would advise that a contribution should be sought for wetland creation / enhancement elsewhere. I am aware that the development of the adjacent site required the import of a significant amount of fill to level, stabilise and drain the site. If (as seems likely) similar measures are required to bring forward this site for development, it may be difficult to incorporate a new open water habitat feature into the site boundary.

The Biodiversity Net Gain shows a small gain for the site, although this depends on the attenuation basin being able to be designed and managed with wildlife in mind and is does not take into account the potential loss of bird species from the site (the biodiversity metric does not take species into account). I would not accept that the development will be able to achieve a biodiversity gain (or indeed avoid a possible net loss) unless the loss of wetland features can be adequately mitigated / compensated.

It is agreed that the water feature would have been of some ecological value, and the loss of this feature will require compensatory measures in the proposed development designs. The proposed attenuation basin is still to be designed

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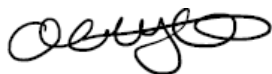
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in detail but can be designed to hold water to form a wetland habitat feature. The final detail of the pond can be conditioned in accordance with the Drainage Strategy. The basin will not be of similar size as what has been lost, though with the recommend planting measures that will be appropriately designed with expert landscape and ecology input to provide species that will provide appropriate biodiversity value.

Botanical surveys of the grassland were limited, undertaken in March which is not an optimal time of year for undertaking grassland surveys. The Ecology report simply states that "it is not anticipated any notable species of flora will be present within the site". I would question the basis of this conclusion, because surveys have been limited. How has this conclusion been arrived at?

The grassland field was found to be of similar species composition and management as the grassland field for the adjacent Russell Homes development at Stubley Mill Lane, Littleborough. It is agreed that March was a sub-optimum period for plant identification. However numerous site visits were completed across the survey season in 2021 and 2022, with no observations of notable flora. In addition, due to the presence of extensive Himalayan balsam, it is possible that the presence of this species will out compete more notable flora, that is known to be present within the local area.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Olivia Collington', with a stylized, cursive script.

Olivia Collington BSc (Hons), MEnvSc, CEnv

Director // Principal Ecologist

For and on behalf of Collington Winter Environmental