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**From:** Planning Services  
**Sent:** 30 May 2022 08:29  
**To:** Elizabeth Hindle  
**Cc:** Planning Services  
**Subject:** FW: F.A.O Elizabeth Hindle FUL/2022/0149

**Categories:** [REDACTED]

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**From:** [REDACTED]  
**Sent:** 27 May 2022 17:02  
**To:** Planning Services <Planning@burnley.gov.uk>  
**Subject:** F.A.O Elizabeth Hindle FUL/2022/0149

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Dear Elizabeth,

Thank you for consulting GMEU on this application at Hollins Cross farm for 200 houses. The application is accompanied by several ecology reports including an assessment of the Biodiversity Net Gain for the proposal. Would it be possible to request a copy of the actual excel BNG metric with the application as well as report /pdf version of the metric. Further information will also be required as to how certain habitats will be enhanced/created as part of the development (for example the ditch network).

I will be on leave after today until 7<sup>th</sup> June, so wanted to get some broad comments to you in advance of this. I have not undertaken a detailed review of the documents yet, as having done an initial assessment, it is clear that there are some fundamental ecological issues that will require further consideration by the applicant.

For example, the BNG calculation and report indicates that there will be a loss of nearly 20 biodiversity units (19.41 units or 44.24% loss). The ecology reports have made suggestions to reduce this loss, for example by preserving and managing the most important ecological habitats, such as the ditches and most ecologically interesting grassland areas on the site (western field –field A in their report) etc, or if this cannot be achieved, providing compensation (on or off site), however this doesn't appear to have been incorporated into the scheme.

The habitat creation tab suggests that a pond (non-priority habitat) will be created. This presumable refers to the attenuation basin proposed on to the north of the site. This area, as it is currently proposed should not be classified as a pond, but the urban SUDS features should be used, given that the drainage strategy states this will be a dry SUDs feature, which will only be used in rainfall events, and will have amenity value.

The anticipated loss of biodiversity value of the site is clearly not in compliance with local planning policy (Burnley Local Plan NE1: Biodiversity and Ecological Networks) states that “all development proposals should, as appropriate to their nature and scale, seek opportunities to **maintain and actively enhance biodiversity in order to provide net gains where possible.**”), National Planning Policy (e.g. Policies in the NPPF encourage biodiversity improvements as part of developments to secure **measureable net gains for biodiversity**) and the principles established in the Environment Act, 2021, which will require development to provide a 10% net gain for biodiversity.

Irrespective of the BNG calculator the mitigation hierarchy does not appear to have been applied to this application, even though the ecology report has made recommendations that it should be. For example, the most ecologically valuable habitats such as the more diverse grasslands (field A) (and possibly areas of marshy grassland –see below

comment) the ditch network etc. should be retained (to avoid harm), or impacts reduced as much as possible. As a last resort compensation (preferably on-site) can be provided. However there is no evidence that these principles (and the advice provided in the ecology report) have been incorporated into the proposals.

The original ecology report (PEA) identified the marshy grassland on the site as appearing to qualify as the Habitat of Principal Importance for the Conservation of Biodiversity in England; 'purple moor-grass and rush pastures', however this doesn't appear to have been addressed within the updated ecology report.

1 pond is identified within the site in the UKHAB map (figure 1 of the BNG Assessment, Botanical Walkover & Invasive Species Check), however this doesn't appear to have been included in the base line data or the great crested newt surveys. It may be that the pond is now dry, but this needs to be explained within the report. If the pond is not dry then further survey work and compensation for its loss (if it cannot be retained) will be required.

In addition I note that a number of bird species have been recorded during the BBS surveys as breeding on or close to the proposed development site, including Section 41 species of conservation concern such as reed bunting and sky lark. In addition the desktop study from LERN suggests snipe and lapwing have been recorded on the site (more details of the desk top data should be presented –only a written summary is presented in the PEA). Whilst the number of these species are not high, I do consider that the application has taken appropriate account of the impact of the proposals on such species of conservation concern - especially the ground nesting species associated with marshy grassland/wetland habitats. Further consideration to (preferably) retain and enhance habitats for this species on site should be provided, or off site provision for grassland habitats which are suitable for the priority breeding farmland birds should be sought.

I hope these comments make sense and are helpful. I can provide further details when I am back from leave, and when additional information has been provided.

Kind regards,

Emma

**Emma Marston**

**Ecologist**

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