

## Technical Note

### Former Bispham High School, Bispham Road, Blackpool

### Response to Comments Received in Respect of Planning Application 19/0241

27<sup>th</sup> September 2019

#### 1. Introduction

- 1.1 The purpose of this technical note is to address issues raised by Mr D J McGrath in respect of the Ecological Report produced by this consultancy in support of a hybrid planning application comprising: (i) a full application for the erection of a cadet hut (relocation of existing building), and (ii) an outline planning application for the erection of up to 176 dwellings with associated open space and infrastructure with all matters reserved for subsequent approval.
- 1.2 This note should be read in conjunction with the full ecological report (referred to subsequently as the CSCA Ecological Report) submitted in support of the respective planning application. For ease of reference, comments made by Mr McGrath have been pasted below in italics, followed by my response in normal type. The comments made by Mr McGrath, as pasted below, are unedited but can be read in full on the Blackpool Council Planning Portal in the documents section of the respective planning application.
- 1.3 It should be noted that Mr McGrath makes comments on both Biodiversity & Amenity as well as other issues. As an ecologist, I am only able to deal with issues regarding Biodiversity so have restricted my response to this area of expertise and have not made comment on any other issues raised where these are not relevant.

#### 2. Response to Comments

- 2.1 My response to Mr McGrath's comments are as follows.

##### 2.2 *Comment 1*

- 2.2.1 *"I have read the EclA from Cameron S Crook and Associates and noticed they have referred to the Rock Gardens park as a Local Nature Reserve - when was that declared? I hadn't seen any notices to that effect and in their Appendix B taken from the Lancashire Environment Record Network (LERN) it's not marked as a County Biological Heritage Site even though it qualifies due to the presence of the White-letter Hairstreak butterflies (under Guideline Le4) and is mentioned as being such in W1 of the Tree Survey authored by the same company. They do mention the Elm trees as being important for the White-letter Hairstreaks which is correct but the butterflies also require sources of nectar. Important plants being Thistles, Brambles, Hogweed and Ragwort. Tall ruderal vegetation may be common, widespread and apparently disposable but it is very important for a huge variety of invertebrate species."*

### **2.3 Response to Comment 1**

- 2.3.1 The comment on whether the adjacent site is or is not a Local Nature Reserve is of little relevance here as it will not be directly affected. Similarly, whether the site qualifies as a Biological Heritage Site (BHS) is also irrelevant. What is important, however, is the presence of white-letter hairstreak butterfly and this was addressed in the CSCA Ecological Report. There will in fact be no significant loss of the food plant for this species (elm) and there is likely to be no net loss of nectar producing plants as the majority of such plants recorded during the ecological survey (primarily common, ruderal species such as thistles, brambles, hogweed and ragwort) will be retained within the proposed green corridor.
- 2.3.2 As Mr McGrath points out, the ruderal species he mentions are commonplace both in the area and across the whole borough. Furthermore, one thing he doesn't mention is that many of the adjacent gardens also grow plants or have 'weed' species that are good nectar producers and it is almost certain that the number of nectar producing plants grown in the form of ornamental trees, shrubs and herbaceous plants, will increase once the proposed new dwellings have been developed. It is a known fact that domestic gardens make a significant contribution to the supply of nectar producing plants for pollinators such as bees, butterflies and hoverflies, and there is no reason to believe that this, combined with the retained habitat along the site margins, will not be the same at this site.
- 2.3.3 Finally on this particular issues, the nectar producing plants that Mr McGrath mentions, are generally considered to be weeds when they occur in public places and more formal, urban situations. Consequently, they tend to be controlled by mowing, strimming or other horticultural methods due to their lack of aesthetic appeal and the rank, uncared-for appearance of this type of vegetation. Hence, the CSCA Ecological Report recommends that the green corridors proposed for retention are consolidated by the introduction of other native plant species as part of an approved landscaping scheme. There is no reason why this cannot include species that are both good sources of nectar and that have more aesthetic appeal and are more suited to an urban area, without compromising the potential to support butterflies such as the white-letter hairstreak as well as other species of butterflies, bees and hoverflies etc.

### **2.4 Comment 2**

- 2.4.1 *"The remainder of my comments refer to the target notes (TN) in their report. I can only comment on Sub-sites B & C as I have no access to Sub-site A although until recently it was the school buildings and associated managed and maintained outside space. The report shows a photograph of a semi-mature Golden Elm in the former school grounds that is proposed for removal. Surely it would be better to retain this disease resistant tree and develop some suitable White-letter Hairstreak habitat around it to give the butterfly the opportunity to spread across a wider area and so be less vulnerable to a local extinction."*

### **2.5 Response to Comment 2**

- 2.5.1 The golden elm that Mr McGrath refers to will not be removed but is proposed for retention. The tree proposed for removal that he is referring to is in fact a deteriorating alder.

## **2.6 Comment 3**

- 2.6.1 *“Taken together Sub-sites B & C qualify for County Biological Heritage Site status for their butterflies under LERN Guideline Le5 - Any site which regularly supports breeding populations of 9 or more butterfly species (excluding those species which are migratory or are largely associated with cultivated plants).”*

## **2.7 Response to Comment 3**

- 2.7.1 Whether or not this is the case has little relevance to current proposals. The question that must be asked is, why if this site qualifies as a BHS and must have been known about for such a long time, has it not already been designated as a BHS? Has Mr McGrath approached the Lancashire Wildlife Trust and/or Lancashire County Council, the organisations that designate such sites? If not, why not? Furthermore, any large, derelict or unmanaged site with sufficient number of ‘weed’ species or other nectar producing plants, is likely to support a significant number of butterflies.
- 2.7.2 It is also pertinent to note that the nectar producing plants referred to (with some exceptions) are primarily located at the margins of each of the subsites, the playing field and other open grassland areas being of lesser importance due to their being mowed or trampled by heavy public usage. In other words, it isn’t the whole of Subsites B & C that are particularly good for butterflies, but mainly the marginal habitat and occasional clumps of scrub or ruderal vegetation which account for a relatively small proportion of the total area, and will mostly be retained and enhanced as part of the proposed development.

## **2.8 Comment 4**

- 2.8.1 *“TN 22 The boundary hedgerow is important for the local population of House Sparrows and should be enhanced with suitable dense shrub planting. Any development should have House Sparrow nesting cavities provided in suitable locations on the new properties.”*

## **2.9 Response to Comment 4**

- 2.9.1 The boundary hedges will be mostly retained and consolidated. Recommendations were also made in the CSCA Ecological Report for provision of bird boxes and this is something that is routinely addressed and will likely be secured by an appropriate planning condition.

## **2.10 Comment 5**

- 2.10.1 *“TN 25 The field has a thriving population of Common Sorrel, the food-plant of the Small Copper butterflies, there are also large numbers of Meadow Brown and Small Skipper butterflies found on this field.”*

## **2.11 Response to Comment 5**

- 2.11.1 Common sorrel is a very common, widespread plant species across the borough. Loss of the fields will not have a significant impact upon butterflies and the boundary habitat that will be retained and enhanced (allowing sorrel to continue to grow), plus the provision of garden plants in the proposed new dwellings, is likely to compensate for any such losses (small copper also uses common dock as a foodplant, a very common garden and wayside weed).

## **2.12 Comment 6**

2.12.1 *“TN 27, 28 & 30 The former field boundary hedgerow. In most years, including this year, it has nesting Lesser Whitethroat (Green listed but fairly scarce with about 75000 territories (150000 individuals) but that's only roughly the same as the human population of Blackpool), Song Thrush (Red listed) and Greenfinch (Green listed but the current decline would raise Red listing and cause it to be rated as 'Endangered'; BTO Birdtrends). The hedge is also important for a wide variety of invertebrates including several species of both bumble bees and solitary bees.”*

## **2.13 Response to Comment 6**

2.13.1 The hedges that bound the site will be retained and consolidated. There will be no works that affect bird breeding sites carried out during the bird breeding season.

## **2.14 Comment 7**

2.14.1 *“TN 29 There are large colonies of Yellow Meadow Ants around the north west corner of the mound. This sunny, sheltered area is also favoured by several species of butterflies”*

## **2.15 Response to Comment 7**

2.15.1 It will not be possible to retain the ants. Whilst ant mounds are a sign of habitat longevity, in this case the site is relatively recent. It may be possible to relocate the colony to another suitable site, though yellow ants are not scarce, nor are they endangered but rather, common and widespread, so the justification for this is not strong. Butterflies will be accommodated in the proposed green corridor that will follow the site boundaries.

## **2.16 Comment 8**

2.16.1 *“TN 31 Large patches of Birds Foot Trefoil here are important for the Common Blue butterflies which struggle elsewhere around the North Shore/Bispham area due to not being able to complete their lifecycle as the where the plant grows it is mown too frequently.”*

## **2.17 Response to Comment 8**

2.17.1 Areas of retained habitat within the proposed green corridor could easily include birds-foot trefoil along the margins, either by natural colonisation or deliberate introduction. It would be feasible to employ a management regime to ensure that these plants are not mown whilst flowering thereby providing food for common blue butterflies.

## **2.18 Comment 9**

2.18.1 *“There is also a colony of Ploughman's Spikenard *Inula conyza* which varies in numbers from year to year that wasn't discovered for the Flora of North Lancashire (Greenwood E. 2012). This species only occurs in 23 2km x 2km tetrads of the 466 in Lancashire, all but four are on the Morecambe Bay limestones the others are coastal in Fleetwood and St Anne's making these the only known inland population south of the Morecambe bay area and thus qualifies the area as a County Biological Heritage Site under LERN Guideline Ff 4(b) Any site which supports a population of a species categorized as "Sensitive" in Provisional Lancashire Red Data List of Vascular Plants where such populations contribute exceptionally to the distribution pattern, or the total population size of that species in the County.”*

## **2.19 Response to Comment 9**

2.19.1 This plant was not present (or visible) when the CSCA ecological survey was carried out. Nevertheless, even if the plant still occurs on site, this is not a typical habitat. Ploughman's spikenard is a plant of sand dunes. The habitat on the Bispham site where this plant was found comprises derelict land – the site of a former building, the spoil heap comprising high proportions of sandy, calcareous material, thereby mimicking the usual habitat of this species. It is likely that this plant was initially brought in via a vehicle or on the boots of either site workers or subsequent visitors to the site.

2.19.2 Whilst the presence of ploughman's spikenard is interesting from a botanical point of view, as this is not a typical site for this plant, designation as a BHS as suggested by Mr McGrath would be highly questionable in nature conservation terms and would have negative ramifications since rare or scarce species frequently turn up as adventives in inappropriate places (I have numerous rare plants in my garden, for example, all of which have presumably been brought in on my boots or clothing).

## **2.20 General Response**

2.20.1 Mr McGrath then goes on to mention various other bird and invertebrate species that have been recorded at various points across the site. Most of these issues have been dealt with above.

2.20.2 Whilst I have no reason to dispute any of his findings, given enough time, any site of adequate size with a reasonable diversity of habitat would produce similar results if surveyed over many years. A well-known study by an ecologist in Leicester recorded hundreds of interesting species in her 'ordinary' suburban garden over a 20-year period. Her records included numerous rarities of both plants and invertebrates including several species of the latter that were new to science. The point being, the plants and animals reported by Mr McGrath, whilst of some ecological interest, are supported on land which is disturbed, located in an urban area, but could easily be supported by appropriate measures such as the proposed green corridor, coupled with avoidance of the bird breeding season and perhaps some translocation of species where feasible.

### 3.0 Conclusion

- 3.1 Taking into account all what I have stated above, it is pertinent to note that all the habitat that will be lost due to development proposals is secondary, mostly disturbed habitat of relatively recent origin. It does not include primary habitat such as ancient woodland or ancient grassland, nor any other UK Priority Habitats such as heathland, moorland, wetland, sand dune or other maritime habitats. All habitats on site are, by definition, common and widespread throughout the borough and relatively easily replaceable. The majority of habitat along the site margins, where most of the ecological interest lies, will be retained and enhanced.
- 3.2 For the reasons outlined above, I would suggest therefore suggest that proposals will not have a significant adverse impact upon biodiversity providing the recommendations in the CSCA Ecological Report are implemented as part of an approved landscaping scheme, subject to an appropriate long-term ecological management plan.

Signed



Cameron S Crook  
Consultant Ecologist