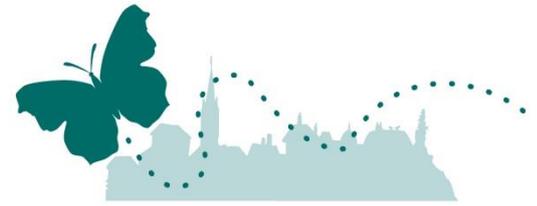


Greater Manchester Ecology Unit
Dukinfield Town Hall, King Street
Dukinfield, SK16 4LA



**Greater Manchester
Ecology Unit**

Email: gmeu@tameside.gov.uk
Telephone: 0161 342 2593

Principal Ecologist:
Derek Richardson BSc Hons MPhil

FAO Susan Parker
Head of Development Management
Blackpool Council

27th September 2019

By e-mail

Dear Sir/Madam

Re 19/0241Hybrid application comprising A) a full application for the erection of a cadet hut (relocation of existing building) B) an outline planning application for the erection of up to 176 dwellings with associated open space and infrastructure(all matters reserved for subsequent approval) | FORMER BISPHAM HIGH SCHOOL, BISPHAM ROAD, BLACKPOOL, FY2 0NH

Thank you for consulting the Ecology Unit on the above planning application. I have the following comments.

Impact on designated sites

Liverpool Bay SPA

The application site is not designated for its nature conservation value, but it is within 2km of the Liverpool Bay Special Protection Area and Site of Special Scientific Interest (SPA/SSSI), a European designated nature conservation site. The SPA has been designated because it supports important populations of wading and water birds.

There is no direct connectivity between the application site and the SPA - it is separated from the SPA by existing dense built development and busy roads. The development of the application site could however have two indirect effects on the special interest of the SPA, by –

- Increasing recreational disturbance of the SPA by causing an increase in local population
- Affecting functionally linked land. Birds using the SPA may make use of inland greenfield sites for feeding and resting during period of high tides and rough weather. If significant numbers of birds use areas regularly they can be said to be 'functionally linked' to the designated site.

On the first point, Blackpool receives many millions of visitors each year, and a high proportion of these visitors use the promenades and the foreshore. The promenade and the foreshore are very busy year-round. Compared to these numbers any increase in recreational disturbance to the SPA

resulting from the housing development would be *de minimis* and can be effectively screened out.

On the second point, the site is surrounded on all sides by existing built development and is therefore subject to high levels of public disturbance. The habitats present are not suitable for use by wading or water birds (bare ground, close-mown amenity grassland and areas of unmanaged grassland and scrub). There no existing (desktop) record of the site having any particular value for wading and water birds.

The site is not therefore considered to be functionally linked to the SPA.

The Rock Gardens

The Bispham Rock Garden, sometimes known as the Devonshire Road Rock Gardens, lie immediately adjacent to part of the site and it is planned to provide access from the site to the Rock Gardens. The site is a local nature conservation resource (Local Nature Reserve) and is known to support the rare white-letter hairstreak butterfly.

The gardens are open to the public throughout the year and are therefore currently subject to high levels of public disturbance. Any increased use of the Rock Gardens resulting from the development of the application site is not therefore considered likely to have a detrimental effect on the nature conservation interest of the Rock Gardens. White-letter hairstreak butterflies have limited ranges, often associated within single trees (elm species). No habitat suitable for use by the butterfly will be lost to the scheme, and there is an opportunity for the scheme to increase available habitat for the butterfly by planting elms as part of any landscaping proposals for the site.

Habitats on the site

The application site can be readily divided into three distinct areas;

- areas of bare and re-colonising ground where the former school buildings have been demolished,
- an extensive area of overgrown former amenity grassland, generally rather species-poor,
- an area of tall-ruderal and scrub vegetation developing with mature and semi-mature broadleaved trees,

The areas of bare ground and former amenity grassland have low-negligible nature conservation value. The areas of scrub and tall ruderal vegetation have low-moderate local nature conservation value, with some value for nesting birds.

There are also hedgerows and linear blocks of mature trees, particularly at the boundary between the application site and the Rock Garden, but also at a boundary between the former amenity grassland and the area of scrub.

All of the habitats present are relatively common and widespread throughout Lancashire.

The current Masterplan for the site (dwg. 18-0740-OP01) shows the most important mature tree lines as being retained as part of the scheme. There also appear to be extensive opportunities for new tree and shrub planting on the site in areas of open space.

I would **recommend** that –

- as part of any Reserved Matters applications for the site comprehensive Landscape Plans should be prepared and submitted to the Council for approval. It would be useful to include Elm as part of the planting plans.
- mature tree lines should be retained and suitably protected from harm during the course of any development of the site.
- no vegetation clearance required to facilitate the scheme should take place during the optimum period for bird nesting (March to August inclusive).

Important Species

I would accept the findings of the ecology survey report submitted to inform the planning application that the site has low-negligible potential to support any specially protected or priority species, except for nesting birds and small numbers of foraging bats. Bird communities on the site are unremarkable and bat numbers recorded were very low. Loss of habitats on the site are very unlikely to affect the local nature conservation status of birds or bats, providing that new landscaping is provided as part of the scheme.

Although there are ponds to the west of the site in the Rock Garden these have low-negligible potential to support great crested newts and there are no desk-top records of great crested newts close to the site.

Although no signs of badgers were recorded during the ecology surveys of the site, it does support some habitat suitable for use by badgers. Badgers are mobile in their habits. I would **recommend** that precautionary surveys for badgers are carried out before any works commence on the site. Badgers are specially protected under the terms of the Protection of Badgers Act 1992.

Ecological enhancement

I would recommend that features for wildlife should be incorporated into detailed designs for the scheme. Such features could include –

- Species-rich grassland
- Shrub beds
- Tree planting, including Elm
- Erection of bat roosting boxes and/or incorporation of integral bat features into new buildings
- Erection of bird nesting boxes

Conclusions

Overall I would offer no objections to the scheme on Ecology grounds, although a number of conditions / advisory notes should be applied to any permission granted to the development proposals to protect nature conservation interests.

I hope that these comments are useful. Please contact me if you have any questions.

Yours sincerely

Derek Richardson
Principal Ecologist