

F/22/94174 Lapstone Playing Fields

Ecology comments 15.6.23

In summary, the sticking points are that the scheme contravenes EBC's environmental protection policies relating to the culverting of watercourses and the loss of priority habitat (wet woodland). There is also the uncertainty of how wet, and therefore successful, the replacement wet woodland will be compared to that being lost. Additionally, if the existing watercourse is classed as a stream, rather than a ditch, then the scheme will result in a biodiversity net loss (on the rivers and streams metric only – there is a gain on the habitats metric).

On the positive, the applicants have done their best to maximise biodiversity opportunities wherever possible on the site, given the site's restrictive nature for the requirements of the scheme.

Biodiversity Net Gain (BNG)

The BNG habitat metric is now fine giving a 12.31% net gain. An area of wet woodland slightly greater than that being lost is now being provided. This has been achieved by rotating the playing field 90°. There is still the potential that the wet woodland being created may not be as wet as the woodland being lost. This is due to a smaller catchment feeding the created woodland compared to the catchment feeding the woodland to be lost.

Please see comments regarding neutral grassland management in Landscape/ Habitat Management Plan section below to ensure habitat uplift is possible to the degree stated in the metric.

The BNG calculation in the rivers and stream metric is in question. As determined by the BNG metric 4.0, if the current watercourse to be culverted is classed as a ditch (as it has been on the submitted calculations 25.5.23), then the scheme will deliver a net gain (calculated as a 31.59% gain on the rivers and streams metric). However, if the watercourse is classed as a stream, then the scheme results in a net loss (calculated as a 12.27% loss on the rivers and streams metric). The watercourse at this location is hard to classify, as it is high up in the catchment and therefore only carries seasonal/ event flows. Additionally, the surrounding land has been reprofiled over time and historical mapping has shown inconsistencies in the presence and absence of this watercourse (probably due to its ephemeral nature). Having spoken to some of the developers of the river metric, the conclusion after much discussion was that it is likely to be a stream (not a ditch) as the historical contours of the area show there would be a natural flow path at this location. This therefore would mean that the scheme delivers a net loss on the rivers and streams metric. If this was being determined from November onwards, then an off-site net gain for the rivers and streams metric would be required, if a net gain couldn't be delivered on site.

Drainage

Detailed drainage plans will be required (can be conditioned). These will need to show how the pitch drainage is fed into the southern (upstream end) of the new wetland (wet woodland) feature. The size of the drainage catchment area for this new wet woodland area must be maximised as much as possible. Cross sections and long sections of this wetland are also required. Details for the remainder of the site and any new discharge points (e.g. around the new culvert) will need to be provided along with culvert details (including drawings).

Landscape/ Habitat Management Plan

If the following points are not possible to resolve before determination, the requirement for further details for habitat/ landscape management will need to be conditioned.

There are still discrepancies between the Landscape Plan LSR2 embedded within the Landscape Management Plan document and the Lapstone Playing Fields Enhancement Plan 25.5.23 Rev 1 (e.g. different areas of neutral grassland are shown on the two plans, the inclusion of a hedgerow on one but not the other). Presumably the BNG calculations have been based on the latter of these plans which will need to form the basis of the management plan for the site so the habitats are correctly managed.

Neutral grassland – LSR2 refers to one area of neutral grassland as wildflower area. The other areas of neutral grassland are not shown on LSR2. It is not clear how the new areas of neutral grassland will be created. Will it be through management change alone? How are the existing (retained) areas of grassland currently managed to enable an uplift/ enhancement (and therefore BNG) through new modified management? The management prescription for this habitat will need to be included in the final Habitat Management Plan.

Wet woodland – the species provided within the new wet woodland area should be more diverse (currently 50 goat willows and 7 alders are proposed). Several different native willow and birch species are suitable for wet woodland planting and would improve its biodiversity if swapped for some of the goat willows. Understorey planting e.g. sedges, should also be provided. These trees may also need watering to help establish them. The created level of wetness of this area is uncertain and will only take run off from a small catchment (part of the playing field). If there are significant periods without rainfall, then this area could potentially be very dry and these trees will therefore also need watering, as required, until established. How is this area will be managed mid to long term needs to be included.

Vegetation/ habitat removal

If the planning permission is to be approved, an up-to-date assessment of the bat roost potential of the trees to be removed and subsequently any required inspections must be carried out prior to removal. This must be conditioned.

Details must be provided to show how any protected species potentially present (e.g. breeding birds, dormice and GCNs) will be safeguarded. This must be conditioned.

CEMP

The revised CEMP is pending.

Sarah Boyd, Ecologist