
PA 141661/FO/2024 - Ecology Response

From [REDACTED]
Date Fri 09/05/2025 14:15
To David Lawless [REDACTED]

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Dear David

Thank you for forwarding Ecological Impact Assessment and Biodiversity Net Gain metric for the above application.

The Executive Summary of the Assessment states "Further survey work is required to assess presence/likely absence of roosting bats within trees to be removed (G5 and T23). The loss of potential roosting opportunities within the trees should be mitigated if these are present and removed". However, this requirement for further survey work is not found in the main text. Clarification is therefore required as to whether bat surveys are needed and if so, the results should be submitted to the planning authority prior to the determination of the application.

Notwithstanding the above, the Assessment makes precautionary recommendations for the protection of other species such as nesting birds, amphibians and mammals. We would therefore recommend that a Construction Environmental Management Plan for Biodiversity be required and the following condition be attached to any permission:

No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of "biodiversity protection zones".*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) Responsible persons and lines of communication.*
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) Use of protective fences, exclusion barriers and warning signs.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Biodiversity Net Gain

The submitted metric demonstrates that the proposals will result in a net loss of biodiversity. The applicant proposes to provide some enhancements to nearby land to make up some of the loss. The applicant should be aware that any units provided offsite, even if on their own land, will need to be registered on the Biodiversity Gain Site register prior to discharge of the biodiversity gain condition/commencement of development, should permission be granted. This in turn means that it must be secured via a legal agreement (either by a S106 agreement with the LPA or via a conservation covenant with a registered Responsible Body).

Even with the proposed works adjacent to the development site, the proposals still result in a loss of biodiversity. No details have been provided as to how this deficit will be overcome, beyond the BNG Assessment stating "alternative options" should be explored. Clarification on this matter is required to demonstrate the applicant will be capable of discharging the standard condition on biodiversity net gain that will be automatically attached to any permission.

Yours sincerely

[Redacted Signature]

[Redacted Name]

Senior Ecologist

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

[Redacted Contact Information]

Website: www.gmwildlife.org.uk

Facebook: www.facebook.com/pages/Greater-Manchester-Local-Record-Centre

X: GMLRC@GMrecordcentre