
Fw: Planning application 143777/FO/2025 consultation - Land Between Junctions Moss Lane East And Barnhill Street

From Planning [REDACTED]
Date Wed 2025-09-17 11:43 AM
To Jennifer Connor [REDACTED]

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From: [REDACTED]
Sent: 17 September 2025 11:02
To: Planning [REDACTED]
Subject: FW: Planning application 143777/FO/2025 consultation - Land Between Junctions Moss Lane East And Barnhill Street

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Hi there,

Thank you for consulting GMEU on the above application.

The application is accompanied by a Preliminary Ecological Appraisal and Bat Roost Assessment (Urban Green, 2025), which found the site to comprise modified grassland, bramble scrub, individual trees, gardens and developed land/buildings.

One building (B1) on site is known to support a common pipistrelle day roost having been surveyed in 2023, while the remaining buildings (B2-B7) were assessed as having low bat roosting potential during the 2025 walkover. Further surveys will therefore be required to confirm the status of the existing roost and assess whether bats are roosting within the remaining buildings. While a bat survey report has been submitted, this is dated to 2023 and only assesses B1. We would expect updated survey data for B1 from the most recent survey season, as well as at least one survey to have been undertaken on Buildings 2 to 7, as per the PEA. Given that all species of bat and their roosts are protected under UK and European legislation and are a material consideration when determining planning applications, such information will be required **prior to determination. We would therefore recommend that the application be deferred until the lacking information on protected species is provided.**

Notwithstanding the above, the remaining mitigation and enhancement recommendations made within Table 8 of the PEA should be adhered to and secured via condition. These include Precautionary Working Methods for nesting birds, badger, bats, common amphibians, hedgehogs and small mammals – these should be

secured via condition, as well as the eradication of the invasive giant hogweed by a suitably experienced consultant should it be disturbed as a result of this development.

A Biodiversity Net Gain Design Stage Assessment (Urban Green, 2025) has been submitted, and an associated metric. These show that a loss of 0.9 habitat units (49.34%) will be incurred on site, and the trading rules will not be satisfied. As such, at least 1.08 habitat units will need to be sought off-site, including at least 0.74 scrub units; the report states that these will be sourced from a local habitat bank. I have no reason to doubt the assessment of the baseline or projected post-development value of the site, and the LPA can be reasonably confident that the relatively small number of units required to achieve a 10% net gain can be acquired when it comes to discharging the condition. As such, the Biodiversity Gain Condition can and should be applied should permission be granted. At this stage, sufficient information will be required to demonstrate that a 10% net gain has been achieved, including and Biodiversity Gain Plan, final version of the metric showing a 10% net gain, and evidence of where off-site units have been purchased from. I would also note that the proposed on-site enhancements will be considered significant. As such, a Habitat Management and Monitoring Plan (HMMP) detailing appropriate management and monitoring measures for 30 years should be secured by either S106 (which GMEU recommend) or a separate condition.

Many thanks,

[REDACTED]

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