
2025_10_09 Ecology comments 143085/FO/2025

From [REDACTED]

Date Fri 10.10.25 12:16 PM

To Planning [REDACTED]

Cc Sue Wills [REDACTED]

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For the attention of Sue Wills

Application: 143085/FO/2025

Dear Sue

Thank you for consulting the ecology unit on this application.

Bats

A ground level tree assessment (GLTA) by Ascerta Ecology (March 2025) has been submitted. The survey identified no potential roost features within the trees to be felled. The Local Records Centre holds few records of foraging or roosting bats in the area. Having assessed the work planned there is negligible potential for the works to disturb roosting bats and no further surveys are required.

Whilst the works have been assessed as having negligible risk for bats, the applicant is reminded that under the Habitat Regulation it is an offence to disturb, harm or kill bats. If a bat and the signs of bats is found all work should cease immediately and a suitably licensed bat worker employed to assess how best to safeguard the bat(s). Natural England should also be informed. We would suggest an informative to this effect be placed on any permission.

Nesting Birds

The trees and shrubs onsite will have the potential to support nesting birds. All British birds nests and eggs (with certain limited exceptions) are protected by Section 1 of the Wildlife & Countryside Act 1981, as amended. Should vegetation removal delayed until after the 1st of March, I would recommend the following condition be added.

No tree or shrub clearance shall occur between the 1st March and 31st August in any year unless a detailed bird nest survey by a suitably experienced ecologist has been carried out immediately prior to works and written confirmation provided that no active bird nests are present, which has been agreed in writing by the LPA.

Small mammals

The Preliminary Ecological Appraisal (Ascerta – March 2025) felt that the site could provide refuge for small mammals, including hedgehog.

Priority species such as hedgehog and common toad are likely present in the area. Reasonable avoidance measures are therefore justified site clearance. I recommend a condition along the following lines is applied to any permission.

Prior to any earthworks, vegetation clearance or construction a reasonable avoidance measures method statement for amphibians, reptiles and mammal shall be supplied to and agreed in writing by the LPA.

Biodiversity Net Gain

The information submitted with the application includes a Biodiversity Net Gain (BNG) report and statutory Biodiversity Metric by Liz Kenyon (Dated March 2025 - 143085_FO_2025-BNG_METRIC-2695269)

The appraisal found the site had some ecological value, consisting of modified grassland, individual trees and scrub.

I have examined the Biodiversity Net Gain (BNG) metric spreadsheet. The baseline and the current proposed post-development calculation has some errors.

After construction of the development, onsite biodiversity remediation and the 10% net gain requirement there is due to be a deficit of 12.15 Area Habitat units;

The guidance states that when recording individual trees the surveyor should “count each individual tree (greater than 7.5cm) within an urban line, group or block of trees”.

The arboricultural report lists 5 groups of trees that all have various different tree species with stems with a diameter at breast height greater than 7.5cm. These trees are not reflected in the metric and should be added.

Conversely, I believe that there are now a number of trees to be planted that will be outside of the curtilage of residential gardens that will be managed by a contacted grounds maintenance company. These trees can be added to the metric in the onsite habitat creation section.

Further to my previous comments I would still maintain that the application has not followed the mitigation hierarchy and more onsite biodiversity could have been incorporated into the development. This is further evidenced by the fact that in the original proposal there was a large pond to be created to the south west of the site. While I accept that this pond was removed for safety reasons, it could have been replaced with an alternative biodiversity enhancement that was not more housing.

I note that Natural England have also referred to the mitigation hierarchy in their response relating to peat, which I will reference separately.

Given that Natural England have requested;

- *Sensitive construction methods to leave peat in-situ*
- *Peat management plan*
- *On-site habitat provision which makes best use of peat needing re-use*

I would suggest that the landscaping plan for the site could be revisited to incorporate more onsite biodiversity. I do however understand that there are competing requirement for a large scale housing development such as this.

I would consider the onsite biodiversity mitigation/enhancement to be significant and should be secured via a section 106 agreement.

(Link to various wording for signposting applicant to statutory framework for Biodiversity Net Gain https://assets.publishing.service.gov.uk/media/663251d969098ded31fca800/BNG_Decision_Notice_Text.odt)

PAS has provided some guidance on how to secure BNG via various conditions. [PAS Biodiversity Net Gain \(BNG\) Legal Agreement and Planning Condition Templates | Local Government Association](#).

If approved, a Biodiversity Gain Plan (BGP), Habitat Management and Monitoring Plan (HMMP) and updated metric should be completed to show how the biodiversity gain will be managed and achieved over the next 30 years and approved by the LPA, before the automatically applied statutory biodiversity gain condition can be released.

For guidance the HMMP should include;

- Description and evaluation of features to be managed.
- Aims and objectives of management.
- Appropriate management options for achieving aims and objectives.
- Prescriptions for management actions.
- Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period and for a minimum total period of 30 years).
- Details of the body or organization responsible for implementation of the plan.
- Ongoing monitoring and remedial measures.

Peat

I see that Natural England have now responded to the peat onsite and have taken the stance that in all likely hood, it would not be possible to restore the site to lowland peatland.

I am happy to be led by Natural England on this matter. Natural England have requested the following;

- Sensitive construction methods to leave peat in-situ
- Peat management plan
- On-site habitat provision which makes best use of peat needing re-use

As stated, as Natural England are now overseeing this element of the application, I will only provide further comments on peat if required or in relation to the BNG element of the application.

Biodiversity Enhancement

I have ready the ecological enhancement plan proposed (Drawing HR-EPP-01) and I am happy with the number and location swift bricks, bat bricks and hedgehog friendly fencing. I would suggest that the provision of these enhancements is conditioned.

I hope these comments are useful.

Ecologist - Greater Manchester Ecology Unit

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