
From: [REDACTED]
Sent: 15 April 2025 09:38
To: Steven Mccoombe
Subject: 142311/FO/2025

Good morning Steven,

Thank you for consulting GMEU on this application at Land At The Former Burnage Cricket Club, Mauldeth Road (142311/FO/2025).

The application is accompanied by a Preliminary Ecological Appraisal (PEA) report and a Biodiversity Net Gain (BNG) metric (Rachel Hacking Ecology). Based on the submitted information, GMEU have the following comments:

As per the PEA report, the site is predominantly modified grassland which appears to be well managed and therefore has limited value for protected/priority species with the exception of hedgehog. The hedgerows and trees on the peripheries may support nesting birds. The mitigation for hedgehog (section 5.4.5) simply states: '*Site clearance will be undertaken carefully to avoid risk of harm to Hedgehog*' – this is not considered to be detailed enough to safeguard hedgehog and a more detailed site clearance plan is required. The enhancement measures including bat and bird boxes recommended within the report should be followed.

Nesting birds - as all wild birds, their nest and eggs are protected under the Wildlife and Countryside Act 1981 (as amended), we would recommend that the following condition be attached to any permission, should it be granted:

No removal of or works to any trees, vegetation or buildings shall take place during the main bird breeding season 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before clearance and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site.

Although it does not impact the outcome of the findings, I have the below comments regarding the PEA which should be considered for applications going forward:

- Section 1.1.3 states: '*No previous ecology surveys have been undertaken and no previous planning applications were identified on Manchester City Council's planning portal.*' This is incorrect as the portal shows numerous previous applications that have been submitted for the site, but most appear to be lacking ecological assessments.
- Section 3.2.1 states: '*No statutory or non-statutory designated sites were identified within 1km*'. This is incorrect as the Pond at Burnage Site of Biological Importance (SBI) is located 850m southeast of the site.
- No data search from the local record centre has been sought however we'd expect that a justification as to why not within the report. There is no consideration for protected/priority species records on or near to the site and no mention of a search on MAGIC for EPS licences granted nearby. The site is of relatively low ecological value, however we would expect this to be undertaken or at least considered within any ecological assessment.

Biodiversity Net Gain (BNG)

- The proposal currently results in a loss of -1.03 Habitat Units (-42.57%) and a gain of 1.90 Hedgerow Units (1557.20%). The trading rules are not satisfied.
- There is only a metric submitted and very little information provided in the PEA report regarding BNG. We would expect more details such as the habitat condition sheets for the baseline survey and detailed post-development information.

- The report suggests that the post-development calculations are based on the landscaping plans, however I can't see that any landscape plan has been submitted and the report simply shows the Proposed Site Layout which doesn't have detailed post-development habitat information in. We would expect a detailed post-development map to be provided so that we can clearly see the proposals.
- The report states: *'It is not possible to achieve 10% Biodiversity Net Gain on site. To achieve this it will be necessary to obtain an additional 1.28 habitat units.'* – the report must indicate how the applicant intends to achieve a minimum 10% gain, e.g. by purchasing offsite credits from a third-party provider etc, so that GMEU can be confident that the gains can be secured. Full details of the offsite provider and how the application will meet 10% net gain offsite can be provided at the condition stage.

In conclusion, there is currently insufficient information provided for the BNG assessment for GMEU to be satisfied that the gains can be obtained and secured either onsite or offsite. A more robust clearance plan to safeguard hedgehog should also be provided. The application should not be determined until this information has been provided.

If you have queries relating to this advice, please do not hesitate to contact me.

Kind regards,

[Redacted Signature]

Ecologist

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